

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-a4b4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2266

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Valerie Snyder

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-c23f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2267

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shanti Toll

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## General Comment

Guns allow for more killing and violence toward all people and USA. PLEASE place people over profit.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

shanti toll



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-8814 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2268

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sadie Sullivan-Greiner

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## General Comment

The NRA is a corporate organization focused on one thing only: How much profit they can make from the sale of weapons. As it happens, I spent part of my career working in the ordnance world at DoD. I also live on the southern border.

The notion that ANY foreign military sales should be released to the Dept of Commerce is ludicrous. Much of the gun violence we deal with is a direct result of US weapons going over the border, to arm the drug cartels, who then create the violence in our cities associated with the drug trade. No sane person would want to increase that.

Weapons sales of any sort need to be housed in the State Dept. To do otherwise is self-defeating.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-z6dz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2269

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

To Whom it May Concern at the DOS:

I'm deeply concerned about the Proposed Rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

While the current administration has made it abundantly clear that US exports, and supporting large business is a TOP priority, the same administration is also name national security as a TOP priority, making major changes to immigration and imports/tariffs under that guise. I fail to see how reducing regulations on exporting firearms DOESN'T affect national security.

The State Department's focus is safeguarding our nation  
The Commerce Department's focus is on promoting American business

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security: facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. How are any of those things in the best interest of our country? And doesn't nation security always come first? For example, the Defense Department has the largest slice of the US budget! And the president has tremendous powers to act in the name of national security (e.g., current travel ban), that are not available to promote business for a reason. So again, I fail to see how this proposed rule protects the national interests of this country. PLEASE STOP caving to NRA special interests, and continue to safeguard our nation.

With respect,  
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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-dmgh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2270

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peggy walsh

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## General Comment

I am deeply opposed to this proposed change to arms and traffic regulation. It is the last thing this country or the worlds needs. It is scam to line more pockets.

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-md2d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2271

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-1l4m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2272

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need safe guards in place to ensure that large quantities of weapons are not being shipped to countries with dangerous regimes. Congress must continue to be notified when large quantities of weapons are sold and shipped and where they are going. The Commerce Department lacks the controls necessary to ensure that the United States remains a conscientious global citizen.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-7if0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2273

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

please don't continue our legacy of dependence on killing jobs

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-gh3q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2274

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Irwin

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## General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It would remove the State Department ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally.

It would remove licensing requirements for brokers.

Would stop the program that inspects pre-license guns and issues reports.

Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism.

There is NO need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-ptx9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2275

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Harrison

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## General Comment

I strongly oppose changing the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department. The change would likely lead to more firearms being exporting to oppressive regimes. It would remove safeguards now preventing organized crime and terrorist organizations from obtaining weapons.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-9xhh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2276

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Wynne

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## General Comment

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, INcreasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PLEASE don't let this happen

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-2or5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2277

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Green

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## General Comment

I am against the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers organized crime, terrorist organizations and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Is the Trump Administration ready to support terrorist and organized crime in this manner? Is Trump ready to see more people die to serve his NRA masters? The world needs less guns not more and much, much stricter regulations and safety laws.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-o4cb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2278

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Colleen Daly

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-ytz3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2279

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julia Michalak

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Exporting military grade weapons without congressional or diplomatic review opens the door to allowing US companies to provide arms to authoritarian governments, terrorists and other unethical entities. The sale of semi-automatic weapons of war is not simply a business decision, it is 100% an ethical and diplomatic decision that requires oversight from US government - and not just the commerce department, which does not have the expertise or resources to adequately evaluate these sales. The United States absolutely should not be selling weapons of war without substantial oversight from elected officials and staff with the expertise to evaluate the human rights and diplomatic implications of these sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-fo79 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2280

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kay Oring

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## General Comment

Keep the international sales of US munitions in the State Department. The US exports too many munitions and arms now. Congress should continue to have the authority to control such sales.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-943u-t6c7 <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2281

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Bronstein

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3] Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-twp9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2282

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Angle

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The NRA is pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security and those of other nations.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This is why it is so dangerous.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. THERE IS NO JUSTIFICATION OR REASON FOR THIS CHANGE.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. THIS NEW TECHNOLOGY ALONE MAKES THIS CHANGE EXTREMELY DANGEROUS.

PLEASE DO NOT ALLOW THIS PROPOSED CHANGE. IT IS DANGEROUS FOR THE US - AND THE WORLD. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-r3g5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2283

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha Fitzpatrick

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## General Comment

I oppose change from U.S. State Dept. to Dept. of commerce for sale of guns.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-l5y9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2284

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeanine Moyer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department is focused on safeguarding our nation, while the U.S. Commerce Department is focused on promoting American business. This transfer of authority could open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports from the State Department to the Commerce Department would lead to firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-z17e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2285

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Yvonne Greenbaum

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## General Comment

The State Dept should continue to be in charge of large arms sales so that they can be properly monitored and reported to the public. This is a play by the NRA to make guns more available everywhere.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-1d1o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2286

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angela Haddock

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## General Comment

Firearms sale should continue to be under the jurisdiction of the State Department. The Commerce Department is, obviously, more interested in MONEY than SAFETY.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-72zh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2287

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alyce Dodge

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## General Comment

I oppose switching the regulation of firearms exports from the U. S. Department of State to the U. S. Department of Commerce.

There are many good reasons why firearms exports are classified as military and are closely regulated under the Department of State, with Congress given notifications of sizable weapons sales to foreign countries and the ability to block these sales for national security.

The Department of State provides needed gun export oversight, which the Department of Commerce does not have the resources to do. Enforcing the current regulations prevents firearms traffickers, terrorist groups, organized crime, and oppressive regimes from obtaining large caches of American guns and ammunition.

However, if gun export licensing is moved to the Department of Commerce, Congress would not be informed automatically of notable arms sales, and safeguards would be removed so that dangerous agents could more easily obtain semiautomatic assault weapons and other powerful firearms, and this opens the floodgates for destabilizing violence around the world.

The handling of export licenses of assault weapons is properly under the Department of State, which is focused on safeguarding our nation. The Department of Commerce, with its focus on promoting American business, is not the suitable agency for regulating arms exports.

I read somewhere Those who live by the sword, die by the sword. Exporting weapons around the world is not an ordinary business like exporting food or solar technology. For the sake of children everywhere, lets do all we can to prevent violence and the suffering it causes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-8sdp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2288

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maxine Petruccelli

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-rsds Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2289

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Renee Ducker

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## General Comment

No Exporting Of Fire Arms. Save Our Children and Garndchildren; Say NO  
Today!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-recj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2290

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Singer

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Seriously.

Susan O. Singer

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-udzt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2291

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michelle Torok

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-o7j8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2292

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brian Wales

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-q3kl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2293

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jane Kennedy

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## General Comment

I understand that the NRA is pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change threatens our security at home and abroad. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This makes no sense at all. Please stop this insanity of gun violence.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-vrsb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2294

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurie Franklin

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## General Comment

I can't even believe you are considering something as bone headed as switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The goals of those two departments are completely opposite - from one that would restrict weapons sales in the interest of national security, to one that would promote it to benefit U.S. businesses. To be perfectly clear, I oppose this rule change that would make our country and the world drastically less safe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-h6h1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2295

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Annie Harmon

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-943u-1lrg <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2296

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Kramer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-mtr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2297

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Drew Lindhoff

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## General Comment

So it now appears that national security takes a back seat to profit. Please keep the regulation of exported gun sales where it belongs...in the State Department, or face the possibility of another 9/11 type attack.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-kzww Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2298

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marjory Donn

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## General Comment

Please do not transfer regulation of firearms from the US State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-uu91 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2299

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** K. Young

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. There is no good reason to make it easier for manufacturers to export firearms to other countries, to remove licensing requirements for brokers or to remove the block on the 3D printing of firearms. This is a dangerous rule change and it should be rejected.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-fx74 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2300

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Cloonan

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-vwj1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2301

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bill Chockla

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## General Comment

Hello,

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department! It is bad enough this country leads the way in allowing "poison for profit" in so many of our consumer goods. All in the name of capitalism, greed, ignorance, arrogance. Now we want to add firearms world wide?! This is pure insanity! Just look at how sick the domestic terrorist murders are in the states today. This will open the door for ALL countries to "enjoy" the murders while the "good, rich, white, conservative christians" roll in more profits! Pro-life? I think not! Pro CULT is all they really are! Studying the ORIGINS of their cult PROVES they are the ones we need to STOP! NOW! So, PLEASE! Do NOT allow these regulation changes!!

Regards,  
Bill

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-b4az Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2302

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kenna Bolton Holz

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-8wj5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2303

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Travis Jennings

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## General Comment

I oppose the rule to change the regulation change the fire export from the U.S. State Department to the U. S. . Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943v-wcz2
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2304

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A L

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## General Comment

I STRONGLY oppose this rule change that would shift the the handling and regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This is entirely inappropriate and unsafe. This responsibility needs to remain with the U.S. State Department, because its focus is national security. The U.S. Commerce Department is completely inappropriate because its focus is on promoting American businesses, and in this case, it would be weapons sales. Its focus would be money and not national security. This is dangerous.

Further, it is my understanding that firearms exports are all classified as military. This is critical because, under the authority of the State Department, Congress is now able to block sales of large batches of firearms to foreign countries. If the authority is shifted to the U.S. Commerce Dept, Congress would be utterly uninformed about sizable weapons sales that it could (and should) stop in the name of national security. Congress would similarly be uninformed about weapons sales to countries where there are serious human rights concerns, as in the case of he Philippines and Turkey.

Again, this change would be a HUGE MISTAKE, and one that I adamantly OPPOSE. It is NOT in The United States best interest. It would be in the NRA's best interest. That is wrong.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-hi33 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2305

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Virginia Konz

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## General Comment

I strongly oppose this proposed change in the control of guns in this country and abroad. It will not make us safer; on the contrary it will provide fewer controls ; makes me feel very unsafe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-qilj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2306

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Loren Kollmar

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## General Comment

I am in opposition to this proposed change. I am not anti gun, but I don't think flooding the world with more guns is responsible or sensible. There are enough loop holes currently existing to negate this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-rqze Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2307

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please do not change the control of the export of firearms to the Commerce Department. Why would we want to do this? To promote terrorists?



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-9nkq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2308

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rahel Ruiz

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## General Comment

I am writing to oppose the move of weapons sales and licensing from the State Department to the Department of Commerce.

Here are several reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In addition, the commerce department does not have adequate resources to enforce export controls.

This transfer is bad for the U.S. and is bad for the world.

Thank you,

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943v-xtfk
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2309

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elaine Madjeski

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-h52t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2310

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Lander

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Don't we have enough people dying from these killing machines???

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-pxqg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2311

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Harris

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## General Comment

To Whom It May Concern:

My family and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a matter of national security - we must not and cannot permit any change that will open the floodgates of weapons trading.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-x279 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2312

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ms. Sandra Silva

**Organization:** self

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-lxwe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2313

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Douglas

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## General Comment

I strongly oppose this U.S. State Dept. rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-hx8q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2314

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jane Waite

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## General Comment

Please DO NOT switch regulations of firearms export from the state Dept.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-ktw0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2315

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Dawson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

And please remember that the majority of military-grade weapons used by the Mexican drug cartels are obtained from the US!



# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943w-tu35
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2316

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kara Brinkman-Addams

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-bsp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2317

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gene and Rita Collins

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## General Comment

I strongly OPPOSE changing regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It could result in more weapons on the street - certainly we have enough illicit use guns. I believe it would result in increased weapons at home and abroad and restrict The State Department's oversight of many current activities. more weapons domestically and internationally.

It would remove licensing requirements for brokers.

It stops the program that inspects pre-license guns and issues reports.

We do not see the need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-6e3d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2318

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Olsen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Thank you for your consideration of this very serious matter.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943w-mf56
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2319

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Juliet Waldron

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## General Comment

Switching regulation of firearms exports from the State Department to the Commerce Department is a dangerous, short-sighted idea. It will facilitate exports of weapons to oppressive regimes, and remove the safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and it will further fuel violence that destabilizes countries and leads to mass migrations of refugees.

If you switch regulation of firearms exports to the Commerce Dept., it will eliminate the State Department's Blue Lantern program, in place since 1940. Blue Lantern carries out hundreds of pre-license and post-shipment inspections and publicly reports on the results of their inspections.

This change will also remove licensing requirements for brokers, which will instantly encourage trafficking. Worst of all, the change to the less well-staffed and more porous Dept. of Commerce will remove the State Department's current block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Dept. successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer--anywhere in the world--to produce lethal weapons. The rule switch you are proposing will remove this block, and enable 3D printing of firearms in our home-grown terrorist organizations--as well as all over the world.

This will contribute to instability and violence all over the world and lead to yet more blood on the hands of our country. Our own nation is already dangerously divided; the rule of law is derided by men who think they are above the law. Allowing the unchecked flow of assault and other large caliber weapons will lead to yet more gun violence, more mass shootings of helpless and harmless civilians and children, and at last to the kind of sectarian bloodshed such as we have seen in countries all over the world--only this time, it could happen right here, in America.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-2c6y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2320

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elisabeth King

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## General Comment

I am registering my dismay at any efforts to increase export of munitions, especially to Mexico, Central America and to any nation that is at all politically unstable. Mexico is the country that I know most about because I volunteer with Greater Boston Trade Justice, a group of citizens in eastern MA working to improve NAFTA. However the dynamics in all these countries are similar.

Access to weapons is critical to the survival of drug cartels, so they love America's current lax gun laws. 70% of guns recovered in crimes in Mexico can be traced to the USA. High caliber rifles are preferred.

At present guns and cash are transported illegally overland along the same routes that drugs are transported north. How much easier would it be if the money obtained from drug sales were to be spent on guns legally imported into their own country? Given the cartels' level of infiltration into local and even federal government, laws regulating legal sales are very weak.

Violence related to drug trafficking is currently a huge cause of fear for life in Mexico and Central America. Thus the problem of aliens illegally crossing the border into USA is exacerbated.

Given these facts, how does increasing firearms exports even make sense if you at the same time want to decrease illegal immigration?

In addition, how is this deregulation different than the Fast and Furious program, in which Border Patrol Agent Brian Terry was killed in December 2010? That program was rightly criticized, especially by politicians on the right side of the aisle. But that program at least tried to actually fight criminal activity. Deregulating gun exports would only increase it.

Please reconsider this deregulation.

Sincerely,

Elisabeth King

23 Greymere Rd. Brighton, MA 02135

Sent from AOL Desktop

Liz King 617-787-0165, 857-225-0396 Bking32@aol.com

Greater Boston Trade Justice FB: Greater Boston Trade Justice

Ezekiel cried out to the King of Tyre, in the abundance of your trade you were filled with violence and you sinned (28:16)

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-l9ux Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2321

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jay Unger

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## General Comment

Automatic and Semi-Automatic Weapons whether currently available in the U.S. from commercial dealers are primarily weapons of war designed to kill people with maximum efficiency. Reclassifying these exports as non-military and subjecting them to less scrutiny when sold outside the U.S. is dangerous both to human life and the U.S. foreign policy interests. Imagine the outrage that will be levied at the U.S. by allies and/or others if such weapons become as easily and inexpensively available abroad as they are presently in the U.S. where they have been shown to encourage gun violence and even mass murder in schools, shopping centers, concert venues, etc. Continuing to apply more scrutiny and higher export registration fees will discourage U.S. manufacturers of such weapons from offering them commercially abroad.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-4e5c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2322

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katherine Cote

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## General Comment

Firearms exports must continue to be classified as military so that they are under the regulation of the State Department, and so that Congress can block sales of large batches of firearms to foreign countries. If firearms are not classified as "military", Congress would no longer be automatically informed about sizable weapons sales and could not stop them in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This would be dangerous to the US and to the world.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-kiae Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2323

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Annie Emmerling

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-b4yr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2324

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kerry Wiessmann

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to

The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-ve13 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2325

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Anderson

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## General Comment

Dear Sir or Madam:

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you likely know, this rule change would, among other things:

(a) eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

(b) remove licensing requirements for brokers, increasing the risk of trafficking.

(c) remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not move forward with this rule change.

Sincerely,

Mark and Candace Anderson

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-kh3t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2326

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Canales

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## General Comment

I oppose the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! As a public health nurse and a citizen concerned about human rights and global health, I strongly oppose the proposed rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-mx7k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2327

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jen Manders

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## General Comment

Please keep ITAR governance under the US State department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943x-msu7
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2328

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Watts

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-vy7h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2329

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Homp

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-l6yw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2330

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Benetta Barnett

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-mgju Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2331

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rita Kain

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## General Comment

The sale of "assault" style weapons must come through the state department. If left to commerce our national interests will NOT be followed. The weapons will probably end up in the hands of enemy governments or terrorists. The truth is, we won;t know until it's to late.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-sbj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2332

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael White

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## General Comment

This change conflicts with the nature of the military grade weaponry we export  
Imagine 10 more Mexico-like countries that will result.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-8ko5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2333

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rev. Phoenix Hawelu-Hills

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## General Comment

Why would we change how guns are handled by our government? We need to keep the U.S. State Department in charge of the selling and exporting of dangerous things like guns and weapons because it is the job of the U.S. State Department to safeguard our country! Changing the department that safeguards our country to the U.S. Commerce Department would be outrageous and unsafe!

Firearms are dangerous!! They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They are used to kill U. S. citizens daily. We need MORE controls on how these weapons are acquired!

They should be subject to far more controls, not less!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Do not change how guns and weapons are classified! They are classified as "military" because that is how we keep our country safe! This is why they are under the regulation of the State Department!!

Please keep us safe. Don't let big business control how many of our enemies have weapons because they don't care about our lives!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-ozb5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2334

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Anonymous

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## General Comment

Please do not enact this rule. Anything that increases traffic in arms should be examined carefully. There isn't enough justification for this if you remove the profit motive. We don't need the industry taking over. The profit motive should not outweigh international concerns, and control should remain with the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-88qm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2335

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Rosa

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-upoq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2336

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nora Brown

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-sjl4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2337

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charlotte Pirch

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## General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I strongly oppose this regulation.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-orco Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2338

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca B. Wilk

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## General Comment

Please do NOT promote gun manufacturers' profits at the expense of people's lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-z6om Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2339

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-o3pn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2340

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-3g3w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2341

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Monroe

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## General Comment

The State Department must continue to regulate the export of firearms. The role of the State Department is to interact with other countries in a way that protect American interests and the interests of other nations. As possible agents of death, firearms can compromise both American and foreign security. The State Department has a compelling interest in preventing, or at the very least overseeing, the sale of firearms. Please do not relinquish this authority.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-fc08 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2342

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Darien Gardner

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## General Comment

To the U.S. State Department,

I am writing to express my opposition to any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I believe such a rule change would be extremely unwise because the State Department has the facilities needed to prevent guns from falling into the hands of organized criminals, political extremists, terrorists and human rights violators around the world. The Commerce Department is much less well equipped to do this.

Sincerely,  
Darien Gardner

Darien Gardner  
51 Pilgrim Dr.  
Northampton, MA 01060

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-mlif Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2343

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edgar Gehlert

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## General Comment

Hi!

Oppose giving this authority to Commerce.

We need less guns here in US and around the world.

Guns are for murdering humans.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-ptk1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2344

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Schumerth

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## General Comment

I oppose transferring arms regulation to the Dept. of Commerce. This would open the door to even more arms trafficking than we already have. I find it stupefying that POTUS Trump, who spends most of his time complaining about arms trafficking across the border, would support such a move. It must be stopped!

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943y-8151
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2345

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A. Pierce

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change in the administration of gun sales will create a fundamentally more violent and unsafe world both inside and outside of the U.S.

This change would:

1. eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them
2. remove licensing requirements for brokers, increasing the risk of trafficking
3. remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

For these reasons I strongly oppose this regulatory change in arms sales.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-jt49 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2346

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mha Atma Khalsa

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## General Comment

As a very concerned U.S. citizen and taxpayer I appreciate your carefully considering my comments!

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

More reasons that the proposed rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please cancel this proposed rule change!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-2ht9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2347

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jodi-beth McCain

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not change the rule

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-6h5d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2348

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Miller

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-umqt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2349

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra aNONYMOUSE

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## General Comment

I strongly oppose the proposed rule to allow international traffic in arms regulations from the State Dept to Dept. of Commerce.

Really, are guns just a commodity now? It would remove the State Departments ability to restrict 3D printing. Is this the best way to govern? Appauling.

It would also remove licensing requirement for brokers and stop the program that inspects prelicenses.

We CANNOT let this happen in our country and our place in the world. Seems like we've given up being civil!.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-xohp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2350

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tana Senn

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## General Comment

I understand there are regulations being explored to move the regulations of the sale of guns from the State Department to the Commerce Department.

I do NOT support this move. The State Department is doing a good job and understands the myriad geopolitical issues with selling weapons to different countries. This context should remain when looking at the sale of weapons. We have seen too much instability in the world from our sale of weapons to varying governments, rebel groups and others. We must look at the bigger picture of weapons sales and not just look at profit.

Please do NOT move this oversight capacity from the State Department to the Commerce Department.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-kdkz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2351

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Matthias Hess

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## General Comment

I strongly oppose any rule changes to give authority over arms exports to the U.S. Commerce Department. I worry that the Commerce Department would push weapons sales abroad, driving deadly conflicts even more than they already do. The State Department's mission is to protect our country, and they authority over firearms exports in order to do so effectively.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-32fy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2352

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charlotte Johnson

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## General Comment

To whom it may concern,

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-9h3b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2353

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce McDonald

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## General Comment

BAN ALL AUTOMATIC AND SEMI-AUTOMATIC WEAPONS IMMEDIATELY! BAN GUN SHOWS!



# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943z-5t25
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2354

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lacey Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-wfkt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2355

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Caryn Cowin

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-zoo8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2356

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** bonnie monte

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. This cannot be allowed to happen! The NRA may be the most dangerous, destructive, immoral and criminal "terrorist" organization in the world today, and I do not use the word terrorist lightly. We MUST retain control and knowledge of all gun sales and we cannot create new systems that would give the NRA and gun manufacturers free rein.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-x1h9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2357

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

I oppose changing rules that would increase International sale of arms. Keep the State Departments Blue Lantern Program. Keep the State Departments blocking of 3D printing of weapons. Why are we trying to arm the world. This is foolish!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-zax1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2358

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Sanders

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## General Comment

I am in opposition to any change in the sales and deportation of firearms listed as category I,II, or III, Doing so may, no, will endanger the security of the nation. Running arms to terroist and drug gangs is limited now but would only escalate arming these thugs under Commerce Dept rules. Again I am in opposition to this change

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-69w8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2359

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edna Montague

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## General Comment

The sale of fire arms and weapons should stay under the State Department to ensure that weapons do not get into the hands of terrorist or enemies of this country. The State Department has been doing a good job of monitoring the sales so they can be stopped before it is to late. The Commerce Department does not have the personnel or experience to monitor the sales of weapons. This change will seriously jeopardize our national security . I ask that there be no rule change regarding the sales of weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-qvil Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2360

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Don't allow the export of semi-automatic weapons. This could put them into the hands of our enemies or those with health issues who would endanger lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-56wt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2361

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephanie Greenberg

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## General Comment

Firearms exports are currently classified as military. That is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. That means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; would remove licensing requirements for brokers, increasing the risk of trafficking; would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-heqo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2362

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patrice Giffith

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## General Comment

The argument of cost savings is false and deceptive. This move to the Dept of Commerce would cause many small conflicts throughout the world to be exacerbated as conflicts would likely worsen, with potential detriment to our national security. This move also affects our immigration policy as many of the immigrants to the US are seeking asylum from severe conflicts and violence in their home countries. The only entities to benefit from this are gun manufacturers. This change needs to be halted now for humanitarian and national security reasons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-amp7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2363

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sally Gudgel

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-943z-9lle <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2364

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Thompson

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## General Comment

Please continue the strict regulation of international firearm sales from United States manufacturers and other US based sellers This helps keep Americans at home and on foreign military duty safe from harm from a weapon originating in our own country. Its the patriotic thing to do. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-w2vg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2365

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Herting

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## General Comment

I am opposing the new rule change that would switch the regulations of firearms export sales from the U.S. State Department to the U.S.Commerce Department . That just gives firearms traffickers, organized crime and other violent agents more opportunities

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-lz3x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2366

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leah Mathers

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-zw0x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2367

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Sollod

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-6lll Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2368

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bruce Beese

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## General Comment

I am against the movement of oversight of firearms exports from the State Department to the Commerce Department.

Please do not make this change. Firearms regulation are just fine under State.

Thank you,

Bruce Beese

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-69bm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2369

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Kent

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## General Comment

How would allowing access to automatic weapons by private citizens in foreign countries keep us in the United States safer? Just asking. David Kent



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-qol7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2370

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

A rule change to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department is a dangerous idea to all Americans, since it has serious implications for our national security.

Currently, firearms exports are classified as military, so the State Department can regulate their sale and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The current administration talks endlessly about national security, but if this rule change goes through, we will all see that their real top priority is allowing the gun manufacturers to make more money and they really don't care about Americans security at all.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-iwts Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2371

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sammy Low

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## General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are under the regulation of the State Department and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This is crazy and dangerous. Do NOT make this rule change and endanger our country further.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-ac7l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2372

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joy Hamby

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## General Comment

I believe the regulation of firearms sales should stay under the US Department of State, so the Congress continues to have veto power. Check and balances are necessary in every public office.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-sicu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2373

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leilani Alberty

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-6iqz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2374

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Collmer

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-qewm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2375

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marcia Riley

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## General Comment

I urge you not to change the control from the dept of Defense to the Dept.of Commerce.Guns are military weapons and should be regulated as such. Bypassing the Dept of Defense is dangerous . We need more control not less and allowing the unchecked sale of guns would create the increase of sales to volitive countries.\

This is just stupid and unnecessary.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-zkbp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2376

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alison Norman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-3m6s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2377

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Koury

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## General Comment

I oppose this rule because the bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-1bzz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2378

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christine Stankiewicz

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9442-ov51
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2379

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Sandiford

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are some ways that this rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-dhd7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2380

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Schildwachter

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-99ro Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2381

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Rozek

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls, which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-v6e9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2382

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kelly Korenak

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## General Comment

I oppose the proposed rule because the regulation of weapons, and especially assault style weapons, should be with the State Department, not the Commerce Department. If the intention of this regulation is to prevent trafficking, then this responsibility should rest with the State Department, as the Commerce Department does not have the resources to properly enforce this. The Commerce Department's aim is to increase trade, and while that is fine if we are talking about strawberries or salt, this is a dangerous precedent to set for a product that is lethal - gun exports and manufacturing should require extra scrutiny and regulation, and I strongly oppose this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-xdqf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2383

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Lemon

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## General Comment

Moving regulation of firearms export from the Department of State to the Department of Commerce seems like a misguided idea, and is likely to decrease our country's security. Without treating firearms as a military export, the risks of accidentally enabling terrorists and arms traffickers are simply too high.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-dqh4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2384

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anna Gladstone

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## General Comment

The proposed rule to loosen regulations on firearm exportation is terrifying. Why would we want to arm the rest of the world? So that they can attack? So that they can build militias and guerilla warfare? So that these guns can end up in the hands of terrorist groups? Stop arming terrorists! Dont implement this change, it is too dangerous for our country and the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-69jh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2385

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thomas Mariconda

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## General Comment

I am an an ordained Deacon in the Episcopal Church and I am very concerned about this rule change. I was in Newtown Connecticut at the time of the Sandy Hook tragedy. I am very concerned that this proposed change will impact the lives of so many living under gun violence. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for



brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-bk6r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2386

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!! This would make it much easier for dangerous people to obtain weapons they could use on Americans at embassies around the world. It would also allow oppressive regimes to get more weapons that they could use on anyone who speaks out against them.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-32ud Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2387

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Abigail Richardson

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## General Comment

Please continue to handle export licensing of semiautomatic assault weapons and other powerful firearms within the U.S. State Department (focused on safeguarding our nation). Do NOT move it to the purview of the U.S. Commerce Department because this transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

If the U.S. Commerce Department is given this responsibility, it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-ybfe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2388

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean Genevie

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-ddy6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2389

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chad Reddick

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## General Comment

I am deeply concerned with the proposed plan to switch regulation of firearms exports from the State Department to the Commerce Department. Anything that can make it easier to sell more guns overseas compromises United States security. Please take whatever steps are necessary to tightly regulate overseas firearms sales in order to keep people in America, and around the world, safer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-690s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2390

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Henry Newhouse

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-9tul Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2391

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** B Dudney, MD

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## General Comment

Opposed to shifting regulation of firearms export to U.S. Commerce Department.

Would stop Congress being automatically informed of weapons sales it could stop in the name of national security, especially to countries with serious human rights abuses, such as the Philippines and Turkey.

Commerce Department lacks resources to enforce export controls: Bureau of Industry and Security does not have staff everywhere. Hence, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate:

- ..the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- ..licensing requirements for brokers, increasing the risk of trafficking.
- ..State Departments block on 3D printing of firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-sqi5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2392

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Warren Wilkins

**Organization:** Warren Wilkins Designer

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## General Comment

Gun money is blood money. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-uuw1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2393

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ivan Rhudick

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress should continue to monitor the sales of large amounts of weapons to other nations in the interest of national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-7xwc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2394

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roger Peeters

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## General Comment

I am a gun owner and former hunter and strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It would remove the State Department ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally.

It would remove licensing requirements for brokers.

Would stop the program that inspects pre-license guns and issues reports.

Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism.

There is NO need to switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-urvd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2395

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Massey

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a dangerous and irresponsible action that must be stopped. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They have been pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department, which its primary focus is on promoting American business. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Firearms exports are classified as military under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With having firearms sales regulated by the U.S. Commerce Department, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The reality is - this is not only dangerous for other countries, but our country as well. This is truly an insane proposition that would turn ugly and deadly fast. The NRA has already proven that they don't care about anyone's life and that they will go to great lengths to get what they want. This must be stopped because they don't care how many people will die in other countries or this one as long as they make their billions. They just don't care.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-1e7m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2396

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rosalind Bresnahan

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## General Comment

I strongly oppose the rule change that would transfer the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Arms are not just another US export to promote and arms sales should be subject to review for non-commercial implications such as use in human rights violations. These are foreign policy issues and should be treated accordingly.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-aoxg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2397

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** L. Fielder

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-2vps Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2398

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Derek Benedict

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We truly do NOT need to export more weapons of death around this planet.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-dkl2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2399

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angela Mogin

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## General Comment

We should not be exporting these dangerous weapons overseas. They serve no purpose other than to kill human beings. In an unstable world, exporting these weapons would be like throwing a match into a pile of tinder.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9444-o838
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2400

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean W

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change will result in more unregulated and unreported gun sales. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9445-pfdm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2401

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elena Rumiantseva

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## General Comment

I disagree with this rule change. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9445-wsrk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2402

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lynette Lowe

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9445-wli3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2403

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

For Gods sake, do NOT allow the switching of the regulation of firearms exports from the State Department to the Commerce Department!

Without question, it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel the violence that destabilizes countries and causes mass migration.

Although Putin would like the way it would further undermine the reputation of standing for world peace that the USA has nurtured since its foundation, even he wouldnt approve of this if it meant his citizens could buy the guns.

Please, please do not let the NRA get away with this dangerous, greedy, thoughtless move. Keep gun control and the control of export licenses of semiautomatic assault weapons and other powerful firearms within the State Department!!

Our national security and, to a large extent, that of the world, depends upon it!

I would ordinarily leave my contact info but I'm afraid of NRA repercussions.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9447-ekh1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2404

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Theresa Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9447-rv6j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2405

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Violet Young

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## General Comment

I think this is a terrible idea and should not be allowed to go forward.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9448-nio6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2406

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Galen Walker

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9449-86n4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2407

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brian Habenicht

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944a-ro36 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2408

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheila Stone

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous and there needs to be more control, not less, to prevent acts of organized crime, political violence, terrorism, and human rights violations around the world.

I strongly oppose this rule that would make the world a more dangerous place.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944a-jiks Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2409

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Livingston

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## General Comment

Dear sir

I am writing to oppose the proposed changes to the regulation of domestic Firearm sales to foreign purchasers.

The United States has supplied weapons to foreign groups in the past only to have those same weapons used against

our own military personnel. Mistakes were made in the past but I would rather arms sales were regulated by the

State Department whose aim is to protect the safety of our nation. The Commerce Department has a goal of increasing

our sales and isn't tasked with determining whether those sales constitute a future danger to our country.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944b-iywe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2410

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I have heard about the proposed rule change moving regulation of arms sales from the Department of State to the Department of Commerce, and I strongly oppose this change. The Commerce Department will encourage arms sales, which will only increase the number of arms throughout the world. This will potentially make travel more dangerous for Americans traveling abroad, and will make the world more dangerous in general--a bad move.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944b-u60x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2411

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephen McDonald

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## General Comment

I am opposed to the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns or US national security concerns. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. In addition, it would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; it would remove licensing requirements for brokers, increasing the risk of trafficking; it would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944b-hreq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2412

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann White

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## General Comment

I understand that there is a request from the NRA to change the department that regulates the export of firearms from the State department to the Commerce Department. The result can only be the increased export of dangerous guns around the world.

Is this wise? American business is amoral too much of the time, and more guns around the world can not be good for the American people or any people. Do not allow this change!

Ann White

Arrington, TN

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-krpl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2413

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Morgan

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## General Comment

Im writing because I am strongly against a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-y0o5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2414

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Em W

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Therefore, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-aly Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2415

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Klein

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Please put people over profits.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-b8nw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2416

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-tokg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2417

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kenneth Plum

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## General Comment

Please do

not eliminate the State Department Blue Lantern Program in force since 1940.

which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-mupo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2418

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** L.J. Coburn

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## General Comment

I oppose the proposed move of firearm exports from the State Department. For our and everyone's safety, we must not help arm the world further. Bad actors are a fact of life and they will ensure greater numbers of efficient killing devices will go to those intent on killing Americans, as well as their fellow citizens, further acting against our personal and national interest.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-fs8c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2419

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** roma ramdhan

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## General Comment

I strongly oppose the move to make it easier for folks to get their hands on semi automatic weapons.  
Military style weapons does not belong in the hands of civilians

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-ttrp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2420

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Jo DuRivage

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## General Comment

I oppose the proposed rule to transfer oversight on small arms (firearms) exports from the State Dept. to the Commerce Dept. Commerce deals with business. The weapons should continue to be regulated by State Dept. We are not talking about normal household goods. I also oppose the elimination of Congressional oversight of commercial weapons sales of \$1 million or more.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-h0ax Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2421

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andrea Charikar

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-u531 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2422

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kristine Gentry

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944d-4lz9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2423

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary H

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## General Comment

If we're serious about terrorism, we need to keep the regulation of firearms export licenses in the State Department. I have the unique vantage point of being a New Yorker who lived through 9-11 and as someone whose hometown has had two school shootings, so I take this issue seriously and I'm concerned that the Department of Commerce will have more lax enforcement than the State Department.

Thanks!

Mary

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944d-35ci Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2424

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I usually try to avoid using comments that are written for masses because I worry they won't be taken seriously. I am disappointed that just about anybody in the United States can legally buy a gun that can kill multiple civilians or LEO in a matter of minutes. The idea that a rule is being considered to spread this irresponsible behavior to other countries over which we have no control and no ability to change laws is appalling. I am attaching a letter that I think should be taken very seriously because I agree with it and want to keep the world safer even as our own country goes up in flames: I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944d-7wj2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2425

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jason Eckardt

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-s1k8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2426

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Lasswell

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## General Comment

This move raises the threat of gun violence and danger in the US and across the world. Without State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism. The children and innocents of the world will suffer while gun lobbyists, manufacturers and the NRA will profit. I strongly oppose this unnecessary change and ask you to not approve it. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-8rza Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2427

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-oam9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2428

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Concerned Citizen

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## General Comment

I am strongly opposed to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security and eliminating congressional oversight of commercial weapons sales of \$1 million or more. This rule has one purpose only: to garner profits for a U.S. gun industry at the expense of safety for communities abroad and, potentially, our own armed service members. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for civilian use; they were designed to kill on the battlefield. Please do all you can within the State department to retain reasonable oversight of small arms trade that balances commerce with international diplomacy and national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-1dkc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2429

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Megan Ball

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## General Comment

As an American citizen, I find it appalling that the government would consider moving this rule to the DOC. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. [2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3] This is highly concerning as we have already seen our current President has no consideration for human rights concerns and will happily give stuff to anyone if they pay the right amount of money.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Some other details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7] The answer is not more guns when we already have significant issues with gun violence in this country.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-n1fc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2430

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Aaron Karp

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## General Comment

The proposed ITAR revision for firearms and ammunition promises little, and risks much. As an analyst of the global arms trade and weapons proliferation for thirty years, I recognize the transformative power of regulatory reform. But this is something else. The proposed revisions promise short-term benefits, which seem unlikely to amount to much in an already competitive global market. That makes this deregulation for the sake of deregulation itself. Meanwhile, the change unleashes three forces certain to accelerate long term American industrial decline and loss of influence over global consequences.

First, they show that the United States no longer will set global normative standards for all form of arms transfers and non-proliferation. Previously the United States Government has shown it will not further tighten restrictions. As the first outright relaxation of oversight standards in arms exports in over fifty years, the change marks a switch in policy dating from the Kennedy Administration.

Second, as the dominant player in global small arms trade, the United States has the most to lose from further loosening. As other countries emulate Americas relaxation of restrictions, not only will there be more firearms reaching more hotspots, but we can be certain the United States will see its share of a more competitive market decline. Other manufacturing countries, with lower wages and more aggressive export subsidies, are more likely to reap the seeds sown here.

Third, the change marks a fundamental shift in the nature of arms export oversight. By reducing the role of the US Government, it leaves regulation exclusively to the recipient government. This shifts the burden of proof in international human rights and state oppression, from outside powers with no direct interest in the outcome, to the recipient governments, governments that are often guilty of using imported weapons in appalling or frightful ways, ways that would be completely illegal in the United States.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-crs3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2431

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stair Calhoun

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## General Comment

I strongly oppose a rule change switching the regulation of firearms exports from the U.S. Department of State to the U.S. Department of Commerce. This would adversely affect our national security and would destabilize countries around the globe



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-sgej Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2432

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Frey

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## General Comment

I wonder when we're going to wake up and realize we're all connected...that we all come from Source. When are we going to stop killing each other? Is money really the only thing on Earth we care about? Is living in fear the only way we know? Now, we have to export all of that as well? What possible justification could there be for shipping out more guns other than greed? One day, our future ancestors will look back on us and think we were utterly barbaric. So very sad that we don't have the courage to have a better legacy than this.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-1k07 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2433

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Sammann

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## General Comment

I oppose changing the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This would remove these exports from the oversight of Congress and would threaten our national security. It would facilitate exports to oppressive regimes, remove safeguards that prevent organized crime and terrorists from obtaining weapons, and fuel destabilizing violence around the world. Do NOT make this unnecessary change, which will put America at grave risk.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-944f-j7mg <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2434

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Mackem

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## General Comment

I'm opposed to the rule change that would switch the regulations of firearms exports from the State Dept to the Commerce Dept for the following reasons:

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-an0n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2435

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Aaron Honore'

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-nbyz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2436

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gregg Slater

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-8crx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2437

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Nestler

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-aylj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2438

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sofi Milani

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## General Comment

I am concerned about fire arms, their increased use, their increased availability. Our country has become a nation of random acts of harm, not kindness. More restrictions, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-lfdq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2439

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** LK Wagner

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-grn3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2440

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Aileen O'Brien

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-1i1o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2441

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

There is no reason to change the rule to permit free sales of arms to foreign countries except to further enrich gun sellers. In the current system there is sufficient oversight; the Commerce Department doesn't have the means or the natural purpose to monitor and restrict sales to prevent sales to enemies of the U.S. and allies, including terrorists.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-wdwt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2442

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rosemary Gordon

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would promote the sale of more guns in the world, thereby making the world less safe for all.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-4vw4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2443

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sue Mancino

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## General Comment

As a former Vietnam Era military spouse I oppose anything which puts our troops in danger. Therefore I oppose switching the regulation of firearms export from the U.S. State Department to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-2ox5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2444

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Meredith Haines

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## General Comment

I am concerned that everything I have learned about this proposal is likely to make our world less safe. Keep control of this potentially dangerous situation and Congress's oversight of arms sales. State Department should maintain regulation.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-3wkn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2445

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Johnson

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-dpmt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2446

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** DENISE HAWKINS

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-3pso Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2447

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Anonymous

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## General Comment

We need more gun regulation not less, I oppose this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-6771 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2448

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** S Noonan

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-f9od Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2449

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Weapons sales should absolutely be classified under 'military' and therefore be regulated by our representatives in government. Congress should have the power to regulate and block weapons sales to foreign agents in the name of national security

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-2wxa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2450

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bob Bartlett

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## General Comment

Expanding the sales of guns, especially semi-automatic and automatic weapons, in this country and the world is not a good idea. These weapons can fall into the hands of terrorists and used to kill innocent people. European countries, Australia, and others that limit the sale and use of these weapons have less mass shootings and gun related deaths then we do. /we need less of these weapons in the world, not more

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-rcvp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2451

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Osmundsen

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. This is a disastrous policy, and the American people will hold you accountable if it is enacted.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-fvi0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2452

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-242p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2453

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Don Hayler

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## General Comment

I oppose shifting the responsibility for gun exports from the State Department to the Commerce Department. As we've seen in recent years, armed groups around the world can cause global instability that can affect American safety. The State Department is in the best position to ensure that firearm exports do not exacerbate military situations or humanitarian crises. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-n12q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2454

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katie Snyder

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-rr5i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2455

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jackie Edmondson

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## General Comment

Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. The Commerce Department does not have the resources to adequately enforce export controls, therefore, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please deny the rule change (that the NRA is pushing) that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-vcge Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2456

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

THIS PROPOSAL WILL EXACERBATE THE REFUGEE CRISIS, and enable terrorists.

This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-1ir8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2457

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bill Cobban

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-67c1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2458

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Westendorf

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## General Comment

I am opposed to this rule change! Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-40jn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2459

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elisabeth Genaux

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Thank you for taking the time to read my comment.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-dxzm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2460

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** T. Katz

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-7qp1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2461

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erin Pence

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-140j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2462

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Trinkley

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-imqt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2463

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Rea

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-8s6q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2464

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mike Corn

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## General Comment

Seriously? The very idea of loosening any export provision on guns is absurd. This country already has a problem of too many guns, resulting in too many deaths. Do not weaken any export rules or laws. It will harm everyone involved.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-qrs9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2465

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Harvey Liszt

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## General Comment

I oppose the proposed rule that allows the freer export of arms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-1uz8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2466

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dudley and Candace Campbell

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## General Comment

We are writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-e4y8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2467

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary O'Neill

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## General Comment

We do not need more guns out there...there are enough now!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-5e7n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2468

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katherine Manners

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-d69p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2469

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Abrams

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## General Comment

PLEASE do not allow guns to proliferate! PLEASE do not allow guns to proliferate!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-m1e2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2470

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ronald Enholm

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-48wf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2471

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun-export deals, transfers the cost of processing licenses from gun manufacturers to taxpayers, and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun-export licensing from an agency with a mission to promote stability, conflict reduction, and human rights to an agency with a mission to promote trade an agency that lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human-rights violations. They should be subject to more controls, not fewer.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-aaco Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2472

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This proposed rule is one of the most wrongheaded and misguided to emerge from the Department under the present administration.

The sale of arms abroad is far more than a business concern. Munitions exports are a matter that profoundly affects the national security of the United States and its relationships with other powers. Those concerns can and should often outweigh the commercial interests of arms manufacturers, and therefore clearly fall within the purview of the Department of State. Our international relations and relationships should not be dictated by gun manufacturers and the NRA, which would be precisely the result of the enactment of the rule.

This proposed rule is a mistake and the Department should immediately abandon it.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-qx22 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2473

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angela Lancaster

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-5io1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2474

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Brown

**Organization:** EAB Consulting

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-mnj1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2475

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bonnie Chalek

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Bonnie Chalek  
New Jersey

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-h3b5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2476

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lynn Winston

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## General Comment

I strongly oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Lynn Winston  
Carbondale, IL

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-llrj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2477

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Todd Thurwachter

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## General Comment

As a 25-year veteran of the U.S. Commercial Service, charged with promoting the export of U.S. products & services, I strongly PROTEST against this change in the approval of the export of U.S. munitions.  
from

It is absolutely critical the the U.S. Department of State retain this authority, in order to balance the financial gain from export sales against our other important foreign policy concerns, such as a country's treatment of its own citizens, its commitment to human rights, rule of law, and basic, fundamental democratic principles.

Any short-term gain in export sales is not worth the wholesale abrogation of the very principles which America -- the shining city on the hill and the world's beacon of democracy -- represents to the world and for which Americans have died.

Todd Thurwachter

Foreign Commercial Service Officer, U.S. Foreign & Commercial Service, Department of Commerce  
(1984-2008)

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-owts Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2478

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-tb24 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2479

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lawrence Keane

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## General Comment

See attached file(s)

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## Attachments

LGK ltr - DDTC - Proposed Rule Cats I-II-III 6 July 2018



**NATIONAL SHOOTING SPORTS FOUNDATION, INC.**

Headquarters: 11 Mile Hill Road, Newtown, CT 06470-2359  
400 N. Capitol Street NW, Suite 490, Washington, D.C. 20001  
202-220-1240 ext. 249 lkeane@nssf.org

**Lawrence G. Keane**

SVP Gov't & Public Affairs  
Assistant Secretary & General Counsel

July 6, 2018

By E-mail:

[DDTCTPublicComments@state.gov](mailto:DDTCTPublicComments@state.gov) subject line, "ITAR Amendment – Categories I, II, and III"

By Internet:

Federal eRulemaking Portal: [www.regulations.gov](http://www.regulations.gov) - Docket DOS-2017-0046

By Federal Mail:

Robert Monjay  
Office of Defense Trade Controls Policy  
Directorate of Defense Trade Controls  
U.S. Department of State  
2401 E. Street, N.W.  
Washington, DC 20226

RE: Comments on Proposed Rule – International Traffic in Arms Regulations: U.S.  
Munitions List Categories I, II, and III, 83 FR 24198 (May 24, 2018).

Dear Mr. Monjay:

The National Shooting Sports Foundation (NSSF) respectfully submits the following comments to the above-referenced Federal Register Notice. NSSF is the trade association for America's firearm and ammunition industry.<sup>1</sup> Formed in 1961, NSSF membership includes more than 12,000 manufacturers, distributors, firearms retailers, shooting ranges, sportsmen's organizations, and publishers. We seek to promote, protect, and preserve hunting and the shooting sports, and we offer the following public comments.

**Summary of High-Level Comments**

The policy justifications for the proposed rule and the corresponding proposed rule by the Commerce Department are described well on Commerce and State Department web pages at: <https://www.bis.doc.gov/index.php/forms-documents/federal-register-notice-1/2220-cats-i-iii-myths-v-facts-posted-5-24-18/file> and <https://www.state.gov/t/pm/rls/fs/2018/282485.htm>

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<sup>1</sup> For additional information on NSSF, please see [www.nssf.org](http://www.nssf.org).



We encourage all those reviewing the proposed rules and the public comments to read these fact sheets to learn what the proposed regulatory rationalizations of U.S. controls on the export of commercial firearms and related ammunition are and, as importantly, are not. So that the policy objectives behind the proposed changes, as well as the “myths” associated with them, are knowable to all those reviewing the proposed rules, we ask the State Department to republish their essential content in the preamble to its final rule. In this way, they will be part of the official record and help inform comments on final agency decisions made regarding the proposed rules.

As better described by these fact sheets and in the preambles to the proposed rules, commercial firearms and related items that are widely available in retail outlets that are now subject to the export control licensing jurisdiction of the State Department under the International Traffic in Arms Regulations (ITAR) on its U.S. Munitions List (USML) Categories I, II, and III would be transferred to the licensing jurisdiction of the Commerce Department’s Export Administration Regulations (EAR) in a series of new and coherently organized Export Control Classification Numbers (ECCNs). These proposed rules are the logical continuation of an effort began in 2010 under the Obama Administration to modernize the administration of U.S. export control regulations “to create a simpler, more robust system that eases industry compliance, improves enforceability, and better protect America’s most sensitive technologies.” We agree with the objectives of these bipartisan and widely supported changes. The proposed changes merely align the regulations with the nature of the items at issue, thus more efficiently accomplishing the national security and foreign policy objectives of the controls. Such changes reduce unnecessary burdens for both the U.S. Government and U.S. industry.

We have reviewed the proposed rule thoroughly with our membership. Except with respect to several of our comments set forth below, most members have told us that the final versions of the rules would eventually be beneficial because they would significantly reduce the overall burden and cost of complying with controls on the export of commercial firearms and ammunition. All who responded told us that there would be an initial short-term increase in burden and cost because of the need to re-classify thousands of commodity, software, and technology line items and SKUs affected by the new rules, but that the long-term regulatory burden reduction would significantly outweigh the short-term need to adjust internal compliance programs and practices. There would also be significant short-term costs and burdens associated with the need to become familiar with the nuances of the EAR and new BIS licensing officers. However, this burden, we believe, would be largely addressed by BIS’s long-standing commitment of industry outreach and training resources, which we appreciate. We also believe that DDTC staff will continue their robust outreach and training efforts as well.

Our members understand that there would be no change to the licensing policies for end item firearms and related ammunition. If a gun required a license to export when it was regulated by the State Department then it would require a license to export when it is regulated by the Commerce Department. If an export to a particular destination or end user would have been denied or approved before, it would be denied or approved in the same manner under the new rules. Applications would go through the same interagency review process, including by the Defense Department and also the State Department’s human rights and other experts. Under the new rules, no approvals would be converted to denials or denials to approvals.

Nonetheless, most of our members, particularly the small- and medium-sized companies, believe that the changes will be economically beneficial for them because the eventual regulatory simplification and cost reductions will allow them to consider exporting when they might not have otherwise. Those that already export believe they will be able to expand sales of exports that would have otherwise been approved. They hold these views because BIS and the EAR are simply better able to regulate commercial items than are DDTC and the ITAR. This is not meant to be a slur of DDTC staff, which is excellent. It is merely a reflection of the fact that the ITAR exists to regulate the export of defense articles that provide a significant military or intelligence advantage in a “one size fits all” type approach with regulatory requirements that are more relevant to the export of a fighter aircraft than something that can be purchased at a retail outlet. The EAR exists to regulate dual-use, commercial, and less sensitive military items that warrant control, but in more tailored ways to fit the specific national security and foreign policy, including human rights, issues posed by the items.

These conclusions have been proven thousands of times through the application of similar export control reforms for other sensitive commercial or less sensitive military items that have been transferred to Commerce’s jurisdiction over the course of the last eight years. For example, under the Commerce system, there are no fees to apply for licenses. There are no redundant registration requirements for domestic manufacturers. There are no fees for registration. Such fees are bearable for large companies, but often not for small- and medium-sized companies. The license application forms are vastly simpler. Controls on less sensitive and widely available and basic parts, components, and technology are more tailored and allow for less burdensome trade with close allies through license exceptions. Sales with regular customers can be combined in to fewer license applications, thus reducing overall paperwork to achieve the same policy objectives. **There are many other benefits to the proposed changes as well described in the proposed rules’ preambles, but our essential conclusion is that, particularly with the changes recommended below, they will lead to growth for U.S. companies, more jobs in the United States, and related economic benefits for the cities and states where the members reside while accomplishing the same national security and foreign policy objectives they have always had.**

Notwithstanding our overall approval of the proposed rules, we have the following comments and suggested edits that would make the rules even more efficient and consistent with the overall objectives of the effort.

### Specific Comments

#### **I. Proposed Changes to Brokering Provisions in ITAR Part 129**

The proposed rule would add “a new paragraph (b)(2)(vii) to §129.2 to update the enumerated list of actions that are not considered brokering [activities]. This change is a conforming change and is needed to address the movement of items from the USML to the CCL that will be subject to the brokering controls, to ensure that the U.S. government **does not impose a double licensing requirement** on the export, reexport or retransfer of such items.” (emphasis supplied). The text of the proposed exception is: “(vii) Activities by persons to facilitate the export,

reexport, or transfer of an item subject to the EAR that has been approved pursuant to a license or license exception under the EAR or a license or other approval under this subchapter.”

The policy goal of not imposing double licensing obligations – i.e., the need to get a license from both State and from Commerce for the same essential transaction – is perfect. The rationalization benefits of the reform effort and the proposed rule would, of course, be ruined if, after the regulatory change, the parties involved in the same essential transaction would need authorizations from two agencies instead of one without the reform. Indeed, State created the entire paragraph (x) concept for each of its USML categories to avoid the need to get a license from State and a license from Commerce for exports that had EAR-controlled items for use in or with ITAR-controlled items in the same shipment.

The proposed (b)(2)(vii) exception text, however, would, in most cases, not eliminate the creation of a double licensing requirement because the scope of “brokering activities” requiring registration, fee payments, and licensing under part 129 includes many types of activities that occur *before* Commerce (or State under a paragraph (x) authority) would issue a license. Such activities include, with respect to the export, reexport, or retransfer of defense services, U.S.- and foreign-origin defense articles, (i) facilitating their manufacture, (ii) financing, (iii) or insuring. With respect to their purchase, sale, transfer, loan, or lease, pre-license brokering activities include (i) soliciting, (ii) promoting, (iii) negotiating, (iv) contracting for, (v) arranging, or (vi) otherwise assisting.

Thus, for example, one wanting to *promote* or *negotiate* the possible sale of a U.S.-origin firearm that transitioned to the EAR (but which would also be identified in USMIL category I(a)) would need to go through the process of registering as a broker with DDTC, pay a registration fee, and get approval from DDTC to do so. This would be a time-consuming and expensive process – and an effort that would become completely moot under the new (b)(2)(vii) exception if and when Commerce later issued a license to the exporter to allow the export of the firearm being promoted or subject to the negotiations.

We can infer why DDTC proposed this provision, which is to ensure that it is able to review and approve brokering activities before an application is submitted because it will not necessarily know then that the license would be approved later. We recognize that brokering activities are separate controlled events from the act of exporting, reexporting, or retransferring an article. Nonetheless, we respectfully submit that for items that would become subject to the EAR (and also identified on the relevant USMIL categories), maintaining this distinction is over-cautious, creates unnecessary regulatory redundancies, and does not advance the policy objectives of the control.

First, the vast majority of licenses for the export of commercial firearms and related items are and would likely continue to be approved without issue. With respect to those licenses that are not approved, the U.S. Government would still get the final say in the act that really matters from a policy and control point of view, which is the actual shipment of the firearm or other controlled item. Thus, the double burden the proposed approach would impose does not seem warranted because the U.S. government will be able to accomplish its ultimate policy objectives at the end of the day by approving, denying, or approving with conditions the actual movement of the

firearm or related item. This would not be the case for items that would not be subject to the EAR.

RECOMMENDATION I: Thus, to accomplish DDTC's policy objectives without creating the possibility of authorization requirements from two agencies, we suggest that the scope of the brokering obligations over items no longer described on the USML but still described on the relevant USMIL categories (i.e., I(a)-(c), II(a), and III(a)) apply only to such items that are not "subject to the EAR." In this way, DDTC would have control over brokering activities over such items in situations where the U.S. Government would not otherwise have jurisdiction over their later reexport or transfer, such as non-U.S. origin items meeting the description of items proposed to move from USML Categories I-III that would also meet the description of items currently on the USMIL's Category I-III. (Again, for all items that are "subject to the EAR," the US government will still be able to regulate the transaction.) To accomplish this relatively simple solution, a suggested edit to the proposed exception paragraph (b)(2)(vii) is:

"(vii) Activities that would or could result in the export, reexport, or transfer of an item 'subject to the EAR.'"

An even simpler approach would be:

"(vii) Activities that involve items 'subject to the EAR.'"

If there were a violation of the EAR later, such as a violation of the terms of a license, then that would be prosecuted in the ordinary course. If DDTC also wanted enforcement authority over brokering violations in connection with a later export in violation of the EAR, it could insert at note along the lines of the following:

"Note to paragraph (b)(2)(vii): This exclusion from brokering activities for items subject to the EAR does not apply if the activities were part of a conspiracy to violate of the EAR."

We are confident that DDTC and the other agencies reviewing this comment may come up with other ideas. We would be open to them so long as they would eliminate the need for parties to get both a State and a Commerce authorization for the same basic transaction. Otherwise, the new rules would largely defeat one of the primary benefits of the proposed regulatory change, which is the consolidation within the Commerce system of control over the commercial firearms and related items that no longer warrant control on the USML.

## II. USML Category III Ammunition – Projectiles – Pyrotechnic and Steel Tipped

The revised Category III enumerates pyrotechnic material in several subparagraphs. Subparagraph (a)(1) controls "Ammunition that **incorporates a projectile controlled in paragraph (d)(1) or (3) of this category,**" and subparagraph **(d)(1)** controls "Projectiles that use **pyrotechnic tracer materials** that incorporate any material having peak radiance above 710 nm or are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one



or a combination of the following: tungsten, steel, or beryllium copper alloys.” (emphasis supplied).

The revised category is specific in that it only controls ammunition or projectiles with pyrotechnic material “having peak radiance above 710 nm”. This indicates that the control is limited to tracer compositions meant for use with night vision optics rather than controlling all tracers. We agree with this approach. Bright tracers have been used for sporting purposes for years to assist shooters in targeting and marksmanship, and therefore as a dual use item are more correctly controlled on the CCL.

However, there is confusion and possible overlap of controls with regard to subparagraph (a)(6), which controls “**Ammunition employing pyrotechnic material in the projectile base and any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems.**” (emphasis supplied).

The first half of this sentence does not include reference to the radiance parameter of “above 710 nm” and indicates control of **any** ammunition with pyrotechnic material in the base. Since all tracer ammunition is manufactured with “pyrotechnic material in the projectile base,” it is not necessary to designate a separate control for ammunition with pyrotechnic material in the base. And, subparagraphs (a)(1) and (d)(1) already control these articles and include the radiance parameter of “above 710 nm.”

The second half of the sentence articulates controls on “any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems.” Since peak radiance above 710 nm is required for tracer ammunition to be suitable for use in night vision devices, having another control separately enumerated in (a)(6) seems redundant.

RECOMMENDATION II.A.: We request DDTC to review subparagraph (a)(6) for possible deletion for the reasons stated above.

Subparagraph (a)(3) controls “Shotgun ammunition that **incorporates a projectile controlled in paragraph (d)(2)** of this category, and subparagraph (d)(2) controls “Shotgun projectiles that are flechettes, incendiary, tracer, or explosive.”

Subparagraph (d)(2) does not include any reference to the parameters included in (a)(6) and (d)(1) i.e. “pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm”. Shotgun ammunition with tracer material is being produced for sporting use by a Sporting Arms and Ammunition Manufacturers’ Institute member company.

RECOMMENDATION II.B.: We recommend that subparagraph (d)(2) be revised to delete the word “tracer” and replace it with the phrase “that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm” for the reasons explained above and to make subparagraph (d)(2) consistent with the parameters in subparagraph (d)(1).

Subparagraph (d)(1) also controls “Projectiles that . . . . are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one or a combination of the following: tungsten, steel, or beryllium copper alloys.” (emphasis supplied).

Steel tipped projectiles are used in armor piercing ammunition. Unlike the federal definition of “armor piercing ammunition,” the revised Category III does not exempt ammunition that the ATF has found is primarily intended to be used for “sporting purposes” per the below definition:

In 18 USC 918(a)(17)(A), the term “ammunition” means ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.

(B) The term “armor piercing ammunition” means—

(i) a projectile or projectile core which may be used in a handgun and which is constructed entirely (excluding the presence of traces of other substances) from one or a combination of tungsten alloys, steel, iron, brass, bronze, beryllium copper, or depleted uranium; or (ii) a full jacketed projectile larger than .22 caliber designed and intended for use in a handgun and whose jacket has a weight of more than 25 percent of the total weight of the projectile.

(C) The term “armor piercing ammunition” does not include shotgun shot required by Federal or State environmental or game regulations for hunting purposes, a frangible projectile designed for target shooting, a projectile which the Attorney General finds is primarily intended to be used for sporting purposes, or any other projectile or projectile core which the Attorney General finds is intended to be used for industrial purposes, including a charge used in an oil and gas well perforating device.

RECOMMENDATION II.C.: We recommend that subparagraph (d)(1) be revised to delete the term “steel tipped.” Export controls of articles enumerated in the revised Category III should be consistent with definitions in other parts of federal law. Therefore control of steel tipped projectiles which have been determined to be intended for sporting purposes correctly belongs under the EAR.

### **III. Recommendations for Effective Date of Final Rule and Allowance for Manufacturing Registrations**

RECOMMENDATION III.A. NSSF recommends a 180-day effective date for the final rule. Throughout the Export Control Reform initiative and during transition from the USML to the CCL, the final rule for many other categories had an effective date of 180 days after publication. This gave exporters of those commodities sufficient time to reclassify their products and implement changes in their enterprise systems to become compliant with the EAR. The later effective date also allowed those companies to continue to obtain export licenses from DDTC without loss of business in the interim. The regulatory change for firearms and ammunition will impact many exporters and involve a significant number of export licenses. Most of these companies have had no exposure to the EAR and will require significant training and outreach to understand the new regulations. The extended effective date will allow these firearm and

ammunition exporters sufficient time to learn and implement EAR-centric processes and procedures while still continuing to do business.

RECOMMENDATION III.B. Although the extended period will be beneficial to exporters, it may present issues for small manufacturers and gunsmiths that do not export but are nonetheless required to register with DDTC. Some of these companies may have registration expiration dates within the period prior to the effective date, forcing them to renew a registration which would no longer be required a short time later. Therefore, we also request DDTC make allowance for registration renewal during the 180-day period by extending the expiration dates until after the effective date of the final rule.

#### **IV. Recommendation for Transition of Sound Suppressors to the CCL**

NSSF respectfully requests DDTC consider transitioning control of sound suppressors from the USML to the CCL. At a minimum, NSSF requests DDTC to reconsider the current restrictive policy and allow for commercial exports of these items. The proposed rule retains control of silencers, mufflers, and sound suppressors under USML Category I(e). The current DDTC policy restricts exports of these articles to government and law enforcement agencies only. This policy has been in place for more than 15 years, and is largely out of date with the current worldwide sale and use of suppressors for commercial, sporting and hunting purposes.

Suppressors are a simple design consisting of a casing which contains material to absorb some of the gases from escaping from behind the projectile once it leaves the barrel. Suppressors have only a very limited and specialized military utility. The benefit of a suppressor is that it muffles the sound of the shot to a certain extent. The detriment of using a suppressor is that the projectiles lose both range and penetration. And the more effective the sound suppression is, then the less effective the projectile. In fact, government and law enforcement usage of suppressors is limited to special operating units and such.

However, sporting and hunting use of suppressors has been growing for many years. The largest international commercial suppressor markets are the United Kingdom and New Zealand, with smaller markets throughout Europe. In these countries, there are restrictions on how suppressors can be used. For example, in Norway suppressors can be used for hunting only when hunters are a certain distance away from residential areas. In the UK, suppressors are used with 99% of rifles and are considered a good solution to the problem of noise pollution. There were 154,958 firearm certificates on issue by the end of March 2017, representing a total of 559,302 firearms, which is an increase of 4% compared with the previous year. In New Zealand, suppressor ownership and use is legal with no special permit required. Most .22LR rimfire rifles are sold with threaded muzzles for suppressor use. The majority of rimfire suppressors are sourced from China which sells these items for approximately US\$6.00 with an estimated landed cost of US\$10 each. Suppressors for centerfire rifles are gaining in popularity, and local production in NZ is increasing with one-third of NZ produced suppressors being exported to the UK and Europe. The average price for these centerfire suppressors is approx. US\$360.

Within the US, the sporting and hunting use of suppressors has kept to the same trend as the international markets. There are 1.4 million suppressors registered in the U.S. as of April 2017. Our source is the ATF's annual Firearms Commerce in the U.S. publication exhibit 8, page 15: <https://www.atf.gov/resource-center/docs/undefined/firearms-commerce-united-states-annual-statistical-update-2017/download> The 2017 figure is triple the number of registered suppressors as of April of 2013 which was 494,452 units. And the movement of suppressors from the USML to the CCL will have no effect on domestic registration which will still be required.

Based on the above data regarding the predominant commercial use of suppressors both in the US and overseas, and in comparison to the limited use of suppressors by select groups in the military or LE, we estimate that there are more suppressors being used now for hunting and sporting purposes than for military or law enforcement purposes. These articles can no longer be considered as having a critical military advantage with such widespread foreign availability. The only effect of restricting U.S. exports of suppressors to government or law enforcement agencies is to block U.S. manufacturers and exporters from participating in these legal and growing foreign markets. This is unfair for U.S. manufacturers who are not allowed to compete with foreign producers. If these articles are legal to own and to use commercially in the foreign country, then DDTC should allow for their export from the U.S.

In addition, there is no technology required or in use that warrants the stricter protections of the AECA. Because of the growing dual-use nature of these articles, export controls more correctly belong under the CCL. Controls on suppressors on the EAR would include both "NS" (national security) and "CC" (crime control), and licensing would still be required, but with allowance for exports intended for sporting and hunting purposes.

\* \* \*

We appreciate your consideration of our comments. We would be happy to respond to any questions or concerns, or provide additional information. I can be reached at [lkeane@nssf.org](mailto:lkeane@nssf.org).

Sincerely,

A handwritten signature in black ink that reads "Lawrence G. Keane". The signature is written in a cursive, slightly slanted style.

Lawrence G. Keane



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-m15m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2480

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Firearms are dangerous. They are used to kill people everyday around the world. They should be subjected to more controls not less. The proposed change in regulations will make the world a far more dangerous place. The proposed rules look to be a for profit act for arms dealers and will do nothing for humanity nor the planet. The bottom line is that switching the regulations of firearms from the State Department to the Commerce Department will facilitate exports to oppressive regimes removing safe guards that keep these crime infested terrorist organizations from obtaining weapons which destabilize countries and cause mass migrations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-gjx7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2481

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha Sammartano

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## General Comment

I am writing in opposition to the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Currently, firearms exports are classified as military. For this reason, they are under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would have the following negative consequences:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms.

Firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-jwnc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2482

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rita Egrari

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## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-t5ic Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2483

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Fisher

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-bm5a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2484

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deanna Kizis

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-uyoa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2485

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I OPPOSE any legislation that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. DO NOT ALLOW THIS TO HAPPEN.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-u3m7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2486

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Celia Taghdiri

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-ltzd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2487

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Withheld Withheld

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-h51a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2488

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Handley

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-ghfn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2489

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** winifred Hopkins

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## General Comment

I oppose the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and powerful firearms from the U.S. State Department to the U.S. Commerce Department

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-rtws Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2490

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** ANONYMOUS Anonymous

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## General Comment

SDEMI-AUTOMATIC RIFLES ARE MILITARY AND SHOULD NEVER BE EXPORTED NO  
MATTER WHAT THE NRA SAYS

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-jhwc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2491

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judith Heagstedt

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-6ptp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2492

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela Sowerwine

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-lph4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2493

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Malcolm Kenton

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## General Comment

I write to express strong opposition to a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This rule change would endanger our national security and set a dangerous precedent.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would also remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I look forward to seeing this proposed change scrapped.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-6v9u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2494

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia Tuthill

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rule's elimination of congressional oversight of commercial weapons sales of \$1 million or more has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobby's influence in the rule's description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-bcgk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2495

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Serra

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-eqnu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2496

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Bekavac

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## General Comment

I am writing to OPPOSE the transfer of authority over arms exports to the Department of Commerce from the State Department. As a resident of the District of Columbia, I have no voting representative in the Congress, so I am making my voice heard directly, here and now.

Firearms are the instrumentalities of war: war is evil, and the best way to avoid it is to undertake to understand and combat the sources of war. Treating the export of firearms as a mere form of commerce is shortsighted, stupid and vile. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I have seen war in Vietnam as a journalist; I have tried to combat its aftereffects in the Balkans. Particularly in the latter, control of arms would have limited, to some extent, the predations on the civilian populations. I am utterly opposed to this change: keep firearms export controls in the hands of diplomats, not salesmen.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-x6xs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2497

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jane Dodd

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-7mx1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2498

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lauren Linda

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## General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-jwhc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2499

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Francine Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-e0f9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2500

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marcia Crosbie

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-urxa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2501

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Patterson

**Organization:** Sporting Arms and Ammunition Manufacturers' Institute

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## General Comment

See attached file(s)

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## Attachments

DDTC Letter Docket DOS-2017-0046 6 July 2018



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.  
SINCE 1926

July 6, 2018

By E-mail: [DDTCPublicComments@state.gov](mailto:DDTCPublicComments@state.gov) subject line, "TTAR Amendment – Categories I, II, and III"

By Internet: Federal eRulemaking Portal: [www.regulations.gov](http://www.regulations.gov) - Docket DOS-2017-0046

Directorate of Defense Trade Controls  
U.S. Department of State  
2401 E. Street, N.W.  
Washington, DC 20226

REFERENCE: Proposed Rule – International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III,

Dear Sir:

The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) respectfully submits the following comments to the above referenced Federal Register notice of proposed rulemaking 83 FR 24198, dated May 24, 2018. SAAMI is an association of the nation's leading manufacturers of firearms, ammunition and components, and an American National Standards Institute (ANSI) accredited standards developer. SAAMI was founded in 1926 at the request of the federal government and tasked with creating and publishing industry standards for safety, interchangeability, reliability and quality, coordinating technical data and promoting safe and responsible firearms use.

As the organization responsible for creating manufacturing standards for the firearm and ammunition industry, SAAMI is uniquely qualified to provide technical expertise on this matter. We have reviewed the proposed rule, and agree in general with the transition of the majority of firearms and ammunition to the Commerce Control List. Export controls of commercial firearms and ammunition which are not inherently military, have no critical military or intelligence advantage, and have predominant commercial applications correctly belong under the Export Administration Regulations (EAR).

We would like to raise the following points regarding several items enumerated in the revised Category III — Ammunition and Ordnance and ask for revision or reconsideration.

**Pyrotechnic Tracer Materials**

1. Subparagraph (a)(1) controls "ammunition that incorporates a projectile controlled in paragraph (d)(1) or (3) of this category," and subparagraph (d)(1) controls "Projectiles that use pyrotechnic tracer materials that incorporate any material having peak radiance



above 710 nm or are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one or a combination of the following: tungsten, steel, or beryllium copper alloys.”

Subparagraph (a)(6) controls “Ammunition employing pyrotechnic material in the projectile base and any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems”.

By including the peak radiance parameter of “above 710 nm”, we note DDTC’s intention to control only tracer compositions that emit primarily in infrared which are for use with night vision devices. Such dim tracers, with infrared wavelengths from 710 nm to 1 millimeter, burn very dimly but are clearly visible through night vision equipment. This differentiates from bright tracers, which are the most common type of tracer, or subdued tracers, both of which can overwhelm night vision devices, rendering them useless.

Small arms tracer ammunition that includes pyrotechnic material below peak radiance of 710 nm has been sold commercially for sporting purposes for many years. For example, it is used as a training aid for marksmanship proficiency. We agree with the proposed rule which would maintain control on the USML of dim tracer ammunition with peak radiance above 710nm.

However, we wish to comment on the following:

- a. In subparagraph (a)(6) the radiance parameter of “above 710 nm” is not applied to the first part of the control sentence. As currently written, the phrase “ammunition employing pyrotechnic material in the projectile base” would be interpreted to include all tracer ammunition because the radiance parameter “above 710 nm” is not present in the phrase. Also, pyrotechnic tracer material is only employed in the projectile base, and therefore it is not necessary to enumerate a separate control specifying “pyrotechnic material in the projectile base”.
- b. We note some overlap in controls in subparagraphs (a)(1) and (a)(6). Subparagraph (a)(1) controls ammunition with projectiles controlled in subparagraph (d)(1) which includes “projectiles that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm”, i.e. tracer projectiles. Subparagraph (a)(6) controls “...any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm” which is already controlled in (a)(1) with reference to (d)(1). The only differentiation we note would be reference to ammunition “designed to be observed primarily with night vision optical systems”.

RECOMMENDATION: We recommend subparagraph (a)(6) be revised to delete the phrase “ammunition employing pyrotechnic material in the projectile base”. First, it is not necessary to articulate pyrotechnic material in the projectile base, and deletion of this phrase would remove the confusion that (a)(6) controls all ammunition with pyrotechnic



material including that with peak radiance below 710 nm. Second, the phrase is redundant since such ammunition with pyrotechnic material is controlled under (a)(1). We also request DDTC to provide clarification on which articles would be individually controlled under subparagraphs (a)(1) and (a)(6) since both control ammunition with pyrotechnic/tracer projectiles with a radiance parameter intended for use with night vision devices.

2. Subparagraph (a)(3) controls “Shotgun ammunition that incorporates a projectile controlled in paragraph (d)(2) of this category”, and subparagraph (d)(2) controls “Shotgun projectiles that are flechettes, incendiary, tracer, or explosive.”

We note that this paragraph does not include the parameter “pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm”. A SAAMI member company is currently producing shotgun ammunition with tracer projectiles for commercial use.

RECOMMENDATION: We reiterate our comments above regarding tracer ammunition, and recommend subparagraph (d)(2) be revised as follows: “Shotgun projectiles that are flechettes, incendiary, explosive, or that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm.” This change would make subparagraph (d)(2) consistent with the parameters in subparagraph (d)(1).

### Non-metallic Cases

Subparagraph (a)(5) lists “Ammunition, except shotgun ammunition, based on non-metallic cases, or non-metallic cases that have only a metallic base, which result in a total cartridge mass 80% or less than the mass of a brass- or steel-cased cartridge that provides comparable ballistic performance.” Subparagraph (d)(8) controls “Non-metallic cases, including cases that have only a metallic base, for the ammunition controlled in paragraph (a)(5) of this category.”

This control would include plastic cartridge cases that fit the mass parameters shown. Polymer-cased ammunition (PCA) is currently sold to consumers in the commercial market, and is increasing in popularity. It is considered an alternative to reduce cost and weight in ammunition. This type of ammunition has a significant benefit to the environment and to firearm ranges by reducing both waste and the environmental impact and footprint of hunters and shooters. Controlling PCA under the ITAR would hinder further technological development in this area.

We recommend that control for non-metallic ammunition be removed from the USML and transitioned to the CCL to be controlled with similar metallic cartridge ammunition. Non-metallic cased ammunition is in development by several SAAMI members for sporting and hunting purposes. PCA meets SAAMI specifications for ballistic performance. Revised Category III should only include articles which are inherently military, and PCA does not meet that definition. New ECCN 0A505 on the CCL will control metallic cartridge ammunition (e.g. .308 Winchester) regardless of whether it is used in semi-automatic rifles for sporting use, or in

full-automatic rifles for military use. Therefore, controls for non-metallic cartridges should be the same. To effect this change, we recommend deletion of subparagraphs (a)(5) and (d)(8).

### Primers

Subparagraph (d)(10) controls "Primers other than Boxer, Berdan, or shotshell types."

This description appears to except all primers used by SAAMI members. We believe DDTC's intent here is to control tubular primers used in medium or large caliber ammunition, which SAAMI members do not use in the manufacture of ammunition for sporting arms. We suggest that the designation of primer types could be simplified. Boxer, Berdan, shotshell and muzzleloading percussion caps are all called "cap type" primers by the Department of Transportation, and are classified as UN 0044, "Primers, cap type." We recommend DDTC consider using this description to define primers which would not be controlled on the USML.

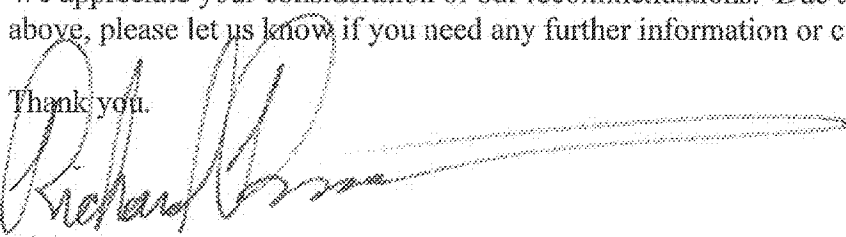
### Technical Data

Subparagraph (e) controls technical data and defense services directly related to the defense articles enumerated in paragraphs (a), (b), and (d) of this category.

This exemplifies the need to make the changes we recommend above regarding pyrotechnic tracer material and non-metallic cases. Technical data related to these items is already in the public domain and well-known. Therefore, it should not be controlled on the USML.

We appreciate your consideration of our recommendations. Due to the technical nature of the above, please let us know if you need any further information or clarification for your review.

Thank you.



Richard Patterson  
Executive Director

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-81vf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2502

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jen Grady

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## General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-3a7w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2503

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gunnar Madsen

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## General Comment

Firearms are military, and their export and oversight should be governed by the State Department, which has the knowledge and expertise to know when and where exports are acceptable.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-ip8f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2504

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Joyner

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## General Comment

The NRA is one of the most powerful and destructive entities in the US, and look at what it has done to this country. Please do not let them expand their influence and destructive activities to the global scene by letting them shift to the Dept. of Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-gtzz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2505

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela Joyner

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## General Comment

PLEASE DO NOT ALLOW THE NRA TO BECOME THE WORLD'S BIGGEST ARMS DEALER  
BY REMOVING THE REGULATION FROM THE STATE DEPT. TO THE COMMERCE DEPT.  
THE PLANET DOES NOT NEED MORE GUNS FROM THE USA.  
Pamela Joyner

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-o4i3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2506

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Mundal

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-iwoj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2507

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nora Polk

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-9etj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2508

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeffrey Cohen

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## General Comment

I strenuously oppose this rule change, believing that we need fewer guns in the world, not more.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-uf52 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2509

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Reiter

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## General Comment

This comment is strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. All we need is for the guns to easily get into the hands of people who are violent and want to hurt other people and Americans. The Commerce Department is not in the business of National Security and all sales should be questioned.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-ruhn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2510

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Francisco

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## General Comment

I am writing to oppose this rule change. I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I am concerned that the Commerce Department does not have the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-lfwj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2511

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jan Replogle

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-ipsv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2512

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Raksha Krishna

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## General Comment

I am a very concerned citizen who is very opposed to this proposed rule regarding gun exports. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less. This rule if approved will limit or even eliminate end user controls, cost the tax payers, remove Congressional oversight, transparency while encouraging more gun production. I earnestly request that this proposed regulation not move ahead.

Thank you

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-p8dv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2513

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Frank Evelhoch, II

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## General Comment

First let me say that this is a totally crazy idea that's proposed. I personally like the fact that with the State Department in control of the the semi-automatic assault and other powerful weapons export licenses that Congress is always notified of sales of large numbers of these types of weapons to foreign countries and can override the sale if needed.

Here are 3 ways that I see this rule change as being harmful to the welfare of all US citizens:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-t3k9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2514

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jason Green

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-k1jq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2515

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bhuvanesh Bhatt

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## General Comment

The proposed rule change does the following and is unacceptable:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please reject this change.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-3ltk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2516

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Cooper

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## General Comment

The proposed rule should not be allowed, because:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-bizt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2517

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Manny Garcia

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## General Comment

ENOUGH OF THE CARNAGE!!!!!!!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-owek Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2518

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Braatz

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## General Comment

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-c2v8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2519

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Manny Garcia

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## General Comment

ENOUGH OF THE CARNAGE!!!!!!  
THIS HAS TO STOP!!!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-r92r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2520

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Cato

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## General Comment

I oppose the DOS proposed rule on international traffic in arms regulations for US munitions list categories I, II & III. On May 24, the Trump administration proposed to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. Action under the rule if it is enacted will endanger lives merely to enrich munitions dealers. The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually, but the Commerce Department does not have the resources to enforce export controls, even now.

The proposed rule change:

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7.Reduces transparency and reporting on gun exports.
- 8.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-84fe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2521

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Herman Rhein

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944k-mxb3
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2522

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Bartlett

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## General Comment

I strenuously object to any action of my government that makes the distribution of military style weapons - or for that matter ANY weapons - easier than it currently is. Our nation does not need to be exporting the violence that our gun culture causes here to infest other nations. The current proposal to shift control to the Commerce Department blatantly prioritizes gun dealer and manufacturer profit over civilization and safety.

The current proposal:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

I do not want my country to stand before the world as preferring money to human rights!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-qsbl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2523

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** P. Quillian

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-vyc3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2524

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Infantino

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

We do not want to make it easier for terrorists to purchase US firearms and use them against their own people or the United States.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-zpme Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2525

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gary Wimmer

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## General Comment

Exporting our sick policies supported by the NRA - a gun in every hand - is the worse idea to ever be even suggested! This absurd rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-jh05 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2526

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bill Holt

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## General Comment

Do not allow the export of more firearms. The world is already bleeding from US made firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-ulpe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2527

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Beth Katz

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## General Comment

See attached file(s)

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## Attachments

Beth Katz Public Comment on State Dept ITAR USML Cat I-III

July 6, 2018

To: Office of Defense Trade Controls Policy, U.S. Department of State  
Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of Commerce

In Reference to **FRN 2018-10366** (State) and **83 FR 24166** (Commerce).

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I am writing to express my opposition to the proposed regulatory changes published in the Federal Register on May 24, 2018, as "International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III" (DOS\_FRDOC\_0001-4527) and "Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)" (83 FR 24166). The proposed changes raise significant concerns for me as a parent, as an American citizen and taxpayer, and as someone who has studied and wrote my graduate thesis on the international small arms trade.

As a parent of a young child, I am deeply concerned about the impact that these changes will have on both global and domestic security for the foreseeable future. The proposed changes would greatly diminish oversight of the export of semi-automatic assault weapons, high capacity ammunition clips and training on such military equipment. The suggested changes would make it more likely that these dangerous weapons will end up in the hands of traffickers, terrorists or cartels and used against US service members. This increases the likelihood for greater destabilization and conflict worldwide as well as for these weapons to be trafficked back into the U.S. for nefarious uses here. The new rule also removes the block on 3D printing of firearms. This will facilitate unregulated gun production in the U.S. and abroad by making it possible for anyone, anywhere, with access to a 3D printer to produce a lethal weapon. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, these changes could generate many preventable tragedies. These proposed changes will create a world that is less safe for my son and other children to grow up in and to live; and therefore should not be adopted.

As an American citizen, I believe that these proposed changes diminish U.S. credibility in the eyes of the international community and compromise our global leadership. The proposed changes call for transferring gun export licensing from the State Department, an agency with a mission to promote stability, conflict reduction, and human rights, to the Commerce Department, an agency with mission to promote trade. In doing this, we are retreating on our global commitment to human rights and acting as though the export of firearms is just another commodity when the impact of these weapons is far more consequential and deadly. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research shows that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are sought out weapons used by criminal organizations in Mexico and other Latin American countries to perpetrate most of the increasing and record levels of homicides in those countries. The U.S. should not be adopting policies like the proposed changes which amplify this. Rather, we should be working collaboratively, as we have under previous administrations, to find ways to prevent and reduce firearms from being used to carry out human rights violations and crime.

As a U.S. taxpayer, I also find these proposed changes to be fiscally irresponsible. The new rule would transfer the cost of processing licenses from gun manufacturers to U.S. taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of

tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and the Commerce Department does not charge any fee for licensing. This means that U.S. taxpayers, such as me, will absorb the cost of reviewing applications and processing licenses rather than the gun exporters that benefit from these sales. In addition, U.S. taxpayers also will need to shoulder the costs of having to build the capacity and expertise of the Commerce Department to properly administer the proposed changes. The Commerce Department currently does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce (see Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf>). The Commerce Department's Bureau of Industry and Security's enforcement office, who would be charged to oversee the new changes, does not have staff in Latin America, Africa, or many other parts of the world and is not equipped to take the same level of preventive measures for end-use controls. In stark contrast, the State Department, who oversees these items while they reside on the USML, has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. The Commerce Department does not have these resources and developing them will come at a substantial cost to U.S. taxpayers.

Finally, as someone who has studied and researched the international small arms trade, I can confidently say that greater regulation, not less as the proposed rule would enable, is needed to curb the disproportionate impact that these weapons have on fueling conflict, terrorism, and crime around the world. One particularly troubling part of the new rule is its reduction of end-use controls for gun exports. It would eradicate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department within State that compiles the U.S. Government's information on human rights violations, decreasing the ability to effectively stop weapons licenses from going to international human rights violators. End-use controls also are weakened by removing the registration of firearms exporters, a requirement since the 1940s. Under the current rules, registration of exporters lets the State Department check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. Migrating the licensing to the Commerce Department will remove new exporters and brokers of these firearms from the State Department database, losing an important part of the evidentiary trail that enables the prosecution of arms traffickers.

It is for all the reasons listed above that I urge you to reject the proposed changes and to keep the items currently listed on the State Department-administered US Munitions List (USML) intact.

Thank you for your time and consideration.

Sincerely,

Beth Katz  
Omaha, Nebraska

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-klj0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2528

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Fehr

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## General Comment

The proposed change from the State Department to the Commerce Department overseeing the exports of firearms is a change from a department that has the necessary staff, knowledge and experience to properly handle such exports to an department which has neither the necessary staff, knowledge and experience and the consequences will be fraught with problems.

In addition as the NRA is in favor of this proposed change it should be a concern the prime motivation is for further accelerated proliferation of guns and greater profits for gun manufacturers, along with increased violence and mayhem in the rest of the world.

Thus, this change has no merit and must be summarily rejected.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-n73y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2529

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose the proposed rule change. It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. In addition, it eliminates Congressional oversight for important gun export deals and transfers the cost of processing licenses from gun manufacturers to taxpayers.

The Commerce Department does not have the resources to enforce export controls, even now, and this proposed rule change would transfer gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. (!)

Please do not approve this rule change. Thank you.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-k9ee Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2530

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Penelope Okamoto

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## General Comment

American has seen the bloody and horrifying cost of unregulated guns in our country. The rest of the world must not suffer needless injuries and death from gunshot wounds simply so American gun manufacturers can make more money.

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change eliminates necessary Congressional oversight for important gun export deals; places the cost for processing licenses on the taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change benefits the profits of American gun makers at the cost of lives around the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-xcgj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2531

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cindy Samuelsen

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## General Comment

I object to the proposed rules:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-kzsj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2532

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joanne Collins

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## General Comment

I oppose a rule change that would switch the regulations of firearms export from the State Department to the Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-fivt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2533

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Stern

**Organization:** Glenwood Management Corp.

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-bm3k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2534

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Drs. James and Judith Lanfrey

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-ivdm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2535

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christine De Angelis

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## General Comment

There is no need to impose our 'gun culture' on other countries. In fact, it is far beyond time to repeal the 2nd Amendment as it pertains to private citizens.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-zfqh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2536

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jerry Bass

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## General Comment

Do not change the rules on exporting firearms for these reasons.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-pdck Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2537

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Arnold

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-41h5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2538

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donna Schmidt

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## General Comment

I could not be more vehemently opposed to this!! Making it easier for people around the world to have dangerous weapons is, at the least, counterintuitive!! We are already suffering from our mistakes with guns being trafficked to Mexico and Latin America, resulting in the migration of those seeking asylum in the U.S. to escape the violence of gangs and cartels. Let's learn from these and other mistakes, such as arming the Afghans many years ago!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-2bz8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2539

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Meha Kamdar

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-q0nn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2540

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Daniel Cole

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. That would endanger our country just to provide increased profits for weapons manufacturers.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-v4jo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2541

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Schmidt

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## General Comment

I oppose this change for the following reasons:

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7.The Commerce Department does not have the resources to enforce export controls, even now.
8. Reduces transparency and reporting on gun exports.
- 9.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-yh47 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2542

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Penny Babus-Schmidt

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## General Comment

We must stop the sale of arms!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-xg10 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2543

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** L. Simmons

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## General Comment

I am strongly opposed to the proposed rule changes for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-vfko Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2544

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dave Mills

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-jbla Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2545

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Leib

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would also:

- 1) Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) Remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-l40f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2546

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Douglas McKee

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## General Comment

Transferring international gun sales to the commerce department is a bad idea. No need to export our gun problems to other countries just because the NRA says you should.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-5854 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2547

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erin Reed

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## General Comment

I am absolutely against this. This is a complete threat to national security. DO NOT allow this to happen

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-g5my Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2548

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stanley Wright

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## General Comment

I am against any and all changes, moves from one agency, that is for the protection of citizens, to another agency that only wants to give extreme monetary gain to gun makers and sellers, with no thought of the possible threat to thousands of innocent peoples lives! Also, the dropping of non- automatic ASSAULT-RIFLES and the LARGER SIZED CLIPS, by their names alone point to their military use, and not to their use for hunting, unless you want to add that hunting and killing whole herds of deer, elk, mountain goats, moose, bears etc. is what you call hunting! There has always been a limit to the number of animals hunted by individual hunters. The word, Assault, used with any guns, has the meaning of attacks upon groups, or masses of individual beings, and those beings are most likely to be humans, there-fore, it is a weapon of mass killing, or murder, if used with regular citizens, as the perpetrator. The complete, Trump Proposal, should be dropped in the nearest trash bin!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-3w5p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2549

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Inge Johnsson

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## General Comment

I am very concerned about the proposed change to easier to spread murder weapons legally across the world, just because the gun industry wants to make more profit. This is not in our interest as a nation, to be complicit in increasing homicide rates abroad. Some of the reasons to not approve this proposed rule change are:

- 1) Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2) Eliminates Congressional oversight for important gun export deals.
- 3) Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4) Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5) Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6) Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7) The Commerce Department does not have the resources to enforce export controls, even now.
- 8) Reduces transparency and reporting on gun exports.
- 9) Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Thanks for this opportunity to share my views as a citizen and voter, and to allow me to express my desire to make the world a safer place, not one where firearms end the lives of thousands every year.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-tbs6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2550

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Colin Powers

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-9qxj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2551

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

In a free capitalist society companies have and do lobby aggressively for total unregulated ability to sell their wares inside and outside the country. Most products that are likely to cause danger to others or to consumers are highly regulated and rightly so like automobiles, medicines and even foods. This protection of the American and world consumer is inherent to the U. S. capitalist core. One exception is guns. Why?

Reasons abound. The point though is about the legality and morality of both selling internally and exporting to the world without logical restrictions of highly dangerous guns and war-caliber weapons to regular citizens in the name of a companys right. What about the right to protect consumers, families and communities? The government has both the economic and moral obligation to protect consumers and all citizens. The recent past legislation expired in the late 1980s that prohibited the sale of automatic and other war-calibre weapons to regular citizens inside and outside the U. S. was a bi-partisan agreement, totally in line with the U. S. Constitution. It is not a coincidence that violence in the last 20+ years has dramatically increased both in the U. S. and is currently ravaging neighboring countries. Unfortunately, this tragedy is largely caused by U. S. supplied and free-flowing arms that have no reason to be in the hands of law abiding citizens and even less accessible to dubious groups. Governments law enforcing forces are overextended and often are part of the many victims high-powered guns enable. A safety-driven and regulated gun industry is otherwise feasible.

Exporting the U. S. phoneme of mass shootings (it does not happen around the world; only with recent terrorist groups), increased violence facilitated by easy availability of guns that should only be allowed in case of war, higher risks of gun-assisted suicide and young violence are against every Americans safety. Similarly, expanding a market of death and violence by U. S. companies does not make any sense.

Restate previous limits for starters. Show what American capitalism is really all about, growing wealth and prosperity peacefully. Regulation of danger is part of this.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-dmen Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2552

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judith Weeks

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## General Comment

I strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. It would remove the State Department's ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally; It would remove licensing requirements for brokers; and it would stop the program that inspects pre-license guns and issues reports. Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and contribute to organized crime and terrorism.

There is NO need to switch control of the export of firearms unless it is to pay for firearms lobbyists.

This is just another ruse by the NRA to gain more control and have less oversight into their actions. PLEASE DO NOT APPROVE THIS MOVE.

Sincerely, a concerned citizen

Judith Weeks

Morrison, CO

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-lwi0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2553

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Ruud

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-91vi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2554

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Megan Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-mq0n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2555

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandi Hebley

**Organization:** Cathedral of Hope

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## General Comment

I am opposed to the proposal to transfer firearms export to the Department of Commerce for these reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-zwb4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2556

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-oomm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2557

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ijj8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2558

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Russell Okamoto

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-wwug Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2559

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rocky Salskov

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## General Comment

You must be kidding me! We do not need more arms throughout the world . . . if there ever were a problem they could use them against us!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-y4t3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2560

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kimber Kaushik

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-7c3f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2561

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ohoj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2562

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Frank Plucinski

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ukm0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2563

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Beth McHenry

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports are military. The Commerce Department does not have the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-9s5r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2564

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dan Caplis

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

Do the right thing and stand up to the military industrial gun runners!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-6b6s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2565

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Kusiak-Peters

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## General Comment

I am extremely concerned about these proposed rule changes. Overseas weapons sales are not just simple financial transactions with little or no consequences if goods are ultimately resold or otherwise passed along to third parties. Allowing weapons to leave these borders should require extra oversight to make sure that we do not inadvertently cause problems diplomatically or allow our troops do not find themselves under attack from our own weapons. These are complex matters that require a careful weighing of many interests. The system currently in place, with the State Department providing oversight, is better able to address the myriad of concerns. The Commerce Department simply is incapable of bringing the same degree of insight to these matters as their focus is only on the monetary, rather than the practical implications for foreign policy and national security. The president and those in his administration like to talk about their concern for national security, but these proposed changes suggest otherwise. I trust actions, not empty words. These changes should not be adopted.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-mxu6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2566

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Monica Zikpi

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## General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-spf4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2567

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Hunter

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-xomf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2568

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elton McQuery

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I used the suggested wording for this comment because I am lazy, and BECAUSE I AGREE!! TOO MANY DAMNED GUNS EVERYWHERE.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-xv90 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2569

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tamera Boyd

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ii01 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2570

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-6xsk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2571

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-m5tn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2572

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann Habafy

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-xgur Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2573

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Neta Jackson

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## General Comment

My name is Neta Jackson, and I live in the Chicago area. I am very concerned about having common sense gun control and oversight of the gun industry, which in no way robs our citizens of their rights under the Second Amendment.

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce

Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

Thank you!

Neta Jackson

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-qzya Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2574

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nora Polk

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-kg06 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2575

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katie Riley

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. This proposed rule change would put the world in jeopardy for more potential harm through proliferation of arms and escalation of warfare and it does not benefit the American people. It only provides for more profits from gun manufacturers.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-ou11 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2576

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judy Schultz

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## General Comment

I am strongly opposed to this rule change and ask that regulations of firearms remain under the jurisdiction of the State Department. The sale of firearms to other countries is a matter of national security, and it is not only inappropriate but dangerous for these sales to be regulated by the Commerce Department. The dangers this rule change pose include firearms reaching oppressive regimes, organized crime, and terrorists, as well as 3-D printing of firearms. There is no justification for this rule change - the profits of gun manufacturers and their lobbyists do not justify the increased danger to Americans and our national security that this proposed rule change poses.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-5sgm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2577

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change will eliminate Congressional oversight for important gun export deals and transfers the cost of processing licenses from gun makers to taxpayers. It also removes statutory license requirements for brokers which could increase the risk of trafficking.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-o9mb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2578

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Woods

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## General Comment

I am deeply concerned by the proposal to move firearms from ITAR to EAR.

I work in the space industry, where we must be exceptionally careful in our handling not only of materials but of knowledge concerning anything that could be used in a weapons system. We are taught that a rocket, even one designed for peaceful purposes, is to be treated as a potential missile.

If ITAR regulates potential weapons, it ought to regulate actual weapons. If it doesn't, perhaps we should be looking at sharing more of our space technologies (which aren't weapons) with the rest of the world.

Moreover, the State Department not Commerce ought to have the final say on where weapons are exported and by whom, as weapon export has an obvious effect on our ability to participate in diplomacy.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-5lbe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2579

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Clarke

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## General Comment

I am opposed to the proposed rule change being sought by the State Department. This is a dangerous move by the State Department which will create more gun violence for other countries involved in the sale of US made firearms and munitions. Semi automatic assault rifles should not be reclassified by the Dept. of State as "non-military" type arms. Members of the US military, as well as groups engaged in armed conflict around the world. The proposal to essentially transfer the cost of processing licensing fees from gun manufacturers to taxpayers is unacceptable. Taxpayers should not have to bear the financial cost of the transactions which companies that sell guns engage in. The removal of statutory license requirements for brokers increases risk of trafficking of these firearms. Businesses in the United States should be able to sell guns to foreign governments, but under the assurance that the weapons sold will not fall risk to trafficking. This proposal enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. I am firmly opposed to removing this current prohibition on the 3D printing of firearms. We do not need to add even more enforcement responsibilities to the Dept. of Commerce when it currently has a hard time regulating current export controls. This provision transfers gun export licensing from an agency with a mission of promoting stability, conflict reduction, and human rights, to an agency with mission to promote trade. I, as a private citizen and a taxpayer am against all potential changes which the Department of State has proposed with regards to the exporting of firearms and munitions.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-ceo9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2580

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Sprague

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. That is unacceptable.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-jfhh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2581

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Melissa Madenski

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## General Comment

Dear DOS,

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. I am weary of being taxed for things like a processing license, or eliminating Congressional oversight, not to mention 3D printing of firearms. The rule change will profit the American gun industry while not a penny will be aimed toward anything that might assist the victims of gun violence.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-zkye Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2582

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Polly McGraw

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Isn't it bad enough that our country is awash in deadly weapons used indiscriminately?! Why inflict this on other countries who could easily use them the same way and promote fear and bloodshed there? The arms industry has already made more than enough profits on the death of innocents!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-6q7f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2583

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kai-Mei Fu

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944m-9266
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2584

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sam Bryan jr

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-cfgi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2585

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Yalcin

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-tv8i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2586

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jen Anonymous

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## General Comment

I opposed this proposed rule for the following reasons:

- >Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- >Eliminates Congressional oversight for important gun export deals.
- >Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- >Removes statutory license requirements for brokers, increasing risk of trafficking.
- >Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- >Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- >The Commerce Department does not have the resources to enforce export controls, even now.
- >Reduces transparency and reporting on gun exports.
- >Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

I urge you to oppose this legislation.

Thank you!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-yqc8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2587

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John DeJarnatt

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-fril Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2588

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Gitlin

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-8ef7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2589

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Helen Anonymous

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## General Comment

I totally disagree with moving this to the Commerce Dept! We cant control the massive amount of guns and killings here and to make it easier to export puts other people and countries at risk. Its shameful to want to profit more by causing deaths! What has this administration become?? Ruthless, heartless, immoral, NOTHING like the Republican Party I once knew! Below are additional reasons why this shouldnt happen.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-2ioj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2590

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Earl & Patricia Williams

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## General Comment

We must stop the proliferation of guns, here and abroad!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-ekr2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2591

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debbie Blair

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## General Comment

The proposed changes to the International Traffic in Arms Regulations are a threat to our national security. They would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am strongly opposed to these proposed changes which will provide a heightened threat to our national security and endanger the safety of American citizens.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-n4u2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2592

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Warden

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## General Comment

I oppose the proposed rule primarily because it eliminates congressional oversight, transparency and reporting of gun export transactions. Further the proposal would enable unchecked gun production in the U.S. and uncontrolled exports abroad by removing the restriction on 3D printing of firearms.

Further, there is no valid or rational reason for the proposed rule's treatment of semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Statutory license requirements for brokers, an important check on trafficking of the regulated categories of weapons, would be eliminated by the proposed rule with no alternative means of such control to replace the present licensing system.

The proposed rule, if enacted, would serve only the commercial interests of weapons manufacturers, not the interests American gun owners, the general public in the U.S. or those in other countries and regions experiencing or at risk of civil wars, criminal gang violence and intimidation by unpoliced civilian actors.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-u3xp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2593

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Scherer

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-mq7e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2594

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Minor

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. We need more stringent oversight, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-14fq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2595

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cara Harrison

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## General Comment

I am writing in opposition to the proposal for the U.S. to become a major international weapons dealer. The proposed rule changes are wrong and dangerous for many reasons including:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
  - Eliminates Congressional oversight for important gun export deals.
  - Transfers the cost of processing licenses from gun manufacturers to taxpayers.
  - Removes statutory license requirements for brokers, increasing risk of trafficking.
  - Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
  - Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
  - T--he Commerce Department does not have the resources to enforce export controls, even now.
- Please do not go forward with this proposed change in rule.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-mlvb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2596

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sara Katz

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-b99u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2597

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Glenda Golter

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## General Comment

: I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-qdp0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2598

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Swanson

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## General Comment

I adamantly oppose the rule change that would switch the regulation of the export of firearms from the State Department to the Commerce Department. This change could result in reducing transparency and in firearms ending up in the hands of terrorists.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-9qnr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2599

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Babs Sullivan

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We do not need to be adding US made guns to the terror in other countries.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-hnce Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2600

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain



rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to de

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-k7av Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2601

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Norma Neilson

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## General Comment

I feel that is very important to have strict regulations on the selling of guns of any kind. Our children & innocent people are killed every day and something needs to be done. It will help us to have safer communities and safe place for all of the school children and at events that families and individuals attend. Please help to keep all Americans safe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-4gzd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2602

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Juli Kring

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## General Comment

I wish to comment on the proposal making it easier to export U.S. guns and ammunition globally.

As a parent and a grandparent, this is an issue I feel very strongly about.

I have read that this proposal classifies semi-automatic assault rifles as non-military when they are used by our army. They are also used by opposing forces in armed conflicts, and are prohibited for civilian possession in many countries.

It would remove Congressional oversight for important gun export deals.

Taxpayers would have to pay processing licenses instead of gun manufacturers.

It removes statutory license requirements for brokers, increasing risk of trafficking.

I understand that the Commerce Department does not even have the resources to enforce export controls, as it is.

It reduces transparency and reporting on gun exports.

There are many other reasons that I know the above proposal is a very bad idea that will cost untold lives. Please reconsider this ill timed and very unwise proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-v8pp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2603

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cindy Wilson

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## General Comment

THIS IS VERY DANGEROUS!!! BESIDES HAVING TAX PAYERS PAY FOR TAXES INSTEAD OF GUN MANUFACTURERS. SELLING GUNS NEED MORE REGULATION, NOT LESS. THIS WOULD PUT GUNS EASILY INTO THE HANDS OF TERRORISTS.  
NO. NO. NO.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-hqtd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2604

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ed Perry

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## General Comment

I am totally opposed to the proposed rule for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-g5c5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2605

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alice Suter

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## General Comment

It's time to put a check on the American gun industry. It's bad enough that they take no responsibility for all the fatalities caused by guns in this country, and it should not be easy for them to export death across the world.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-gptj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2606

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Becky Marshall

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## General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-1do7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2607

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Herbert Rothschild

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives



# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-944n-ns9u <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2608

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** carolyn massey

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-qs3s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2609

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ericka Thessen

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-6nbc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2610

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Casey Fast

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Please, members of the US Government, do something to stop the proliferation of weapons both here in the USA and abroad.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-erp5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2611

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Natalie Van Leekwijck

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-mnkw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2612

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** p bryer

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## General Comment

I agree with the following publicly available statement of opposition to the dangerously ill-advised rule change proposal.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-brif Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2613

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Blek

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-u6o4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2614

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** malcolm simpson

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## General Comment

I strongly oppose the proposal to transfer firearms regulation to the commerce dept. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-6672 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2615

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Lee

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## General Comment

The last thing the U.S. needs is to make it easier for businesses to supply powerful assault weapons to the world's most unstable munitions buyers. Do not enact this legislation because it:

- \*Treats semi-automatic assault rifles - developed for wartime use - as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
  - \*Eliminates Congressional oversight for important gun export deals.
  - \*Transfers the cost of processing licenses from gun manufacturers to taxpayers.
  - \*Removes statutory license requirements for brokers, increasing risk of trafficking.
  - \*Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
  - \*Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. This exemption for a new manufacturing technology cannot be applied to weapons production, if we are to consider ourselves as Americans responsible world diplomats.
  - \*Reduces transparency and reporting on gun exports.
  - \*Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- Do not re-direct us on a path to a more violent world, particularly not with taxpayer dollars.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-8apm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2616

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-8gsd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2617

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** L Cassidy

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## General Comment

In a moment of history when a majority of Americans are in favor of stronger gun law, this?

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. When the first murder using a 3D printed weapon that you facilitated through this rule happens, I hope that you notice, and remember that you could have prevented it. Do better for the people. The taxpayers, the parents, the students, the teachers, the international community, need the US government to do better for humans, not corporations and lobbyists. Step up and lead.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-el2z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2618

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Pearson

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## General Comment

I oppose this rule. There are already too many guns and too few protections for humans, especially children, who want to live quietly and in peace. This rule change will result in more harm, more refugees, and more instability around the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-opyp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2619

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

: I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-wjdo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2620

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gail Streicker

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This is a just plain terrible idea that puts profits over the lives of people. Please do not approve!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-fztq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2621

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joan Stoneking

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-2ded Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2622

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Timothy Woolsey

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## General Comment

Is this really a good way to export American values around the world?

Isn't this just yet another result of powerful lobbying activities by gun manufacturers to increase sales?

What possible good can come of this other than increasing the profits of the gun industry?

Wouldn't it be better to promote American values in the form of diplomacy, educational exchanges, artistic exchanges?

We should be making it more difficult to obtain these weapons rather than easier if we are truly interested in a more peaceful world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-fdvv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2623

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Claudia Reyes

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-rf3l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2624

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Philip Yokers

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## General Comment

I oppose re-classifying these regulated weapons from where they are now: "military", under export regulation by the State Department, to the regulation by the Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. That means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

As "military", these regulated weapons are under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-i302 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2625

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cheryl Braginsky

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. We are already fueling too much violence around the world with our arms sales, including weapon sales that support the violence in our neighbor, Mexico.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-bp2c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2626

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** NRA ILA

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## General Comment

See attached file(s)

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## Attachments

Export-Reform\_Cats. I-III\_Final

NATIONAL RIFLE ASSOCIATION OF AMERICA  
INSTITUTE FOR LEGISLATIVE ACTION  
11250 WAPLES MILL ROAD  
FAIRFAX, VIRGINIA 22030



July 6, 2018

Mr. Robert Monjay  
Office of Defense Trade Controls  
United States Department of State  
2401 E Street, Northwest  
Washington, District of Columbia 20226

Via Online Submission: <https://www.regulations.gov/docket?D=DOS-2017-0046>

Re: **Docket No. DOS-2017-0046; RIN 1400-AE30; International Traffic in Arms  
Regulations: U.S. Munitions List Categories I, II, and III**

Dear Mr. Monjay:

I am writing on behalf of the National Rifle Association (NRA) to provide the association's comments on the above proposed rule (the proposal). With some six million dues-paying members, the NRA is America's premier defender of the civil right protected by the Second Amendment. Our members include individuals and businesses that would be directly affected by the changes in the proposal, including gunsmiths, firearm instructors, journalists and writers covering firearm technology and development, hunters, competitive shooters, and manufacturers.

The NRA is very pleased to see that the project of Export Reform has finally circled back to the place where it began, with proposed amendments to Categories I, II, and III of the U.S. Munitions List (USML). These were among the first of the changes planned for the large-scale undertaking to update export controls on dual-use items, and rightly so. The Second Amendment protects an individual right to possess and carry firearms in case of confrontation, extending to

arms in common use among the population for lawful purposes.<sup>1</sup> America boasts hundreds of millions of privately-owned firearms<sup>2</sup> and a robust “gun culture” that has produced countless books, magazine articles, videos, websites, online forums, etc., that exhaustively detail firearm technology and use. It is difficult to imagine any information about the design, development, production, manufacturing, and use of firearms that is not already within the public domain. This same information is commonly available overseas, as are the types of firearms and ammunition the proposal would move off the USML and onto the Commerce Control List (CCL). Meanwhile, the might and sophistication of the U.S. military — as well as America’s armed populace — ensure that no foreign enemy wielding the type of arms at issue in these proposed amendments to the USML could pose a serious threat to this nation’s security.

Of course, movement of commonly-available firearms and ammunition to the CCL would not leave their export unregulated. America already has one of the most well-established and closely-administered systems of regulation for commercial production and distribution of firearms and ammunition in the world, and the proposal would not change that. It is clear from the companion rulemaking published by the Commerce Department that items moving off the USML would remain closely controlled, with the necessity of export licenses remaining the norm. Foreign individuals’ access to firearms and ammunition would also remain regulated under the federal Gun Control Act and the National Firearms Act. Furthermore, the Commerce Department has long regulated exports of various shotguns, as well as their parts, components, accessories, and ammunition. Thus, it has existing knowledge of and relationships with many of the entities the proposal will affect. Those entities, in turn, will also have some familiarity with the Department’s regulatory environment and procedures.

The NRA believes that, on the whole, the proposal correctly balances the imperatives of national and global security, allocation of oversight resources, and promotion of American industry, innovation, and competitiveness. We do, however, think it could be improved in several particulars. We also believe that the timing for the implementation of the rule deserves careful consideration.

Specifically, our concerns involve the following:

- **The retention of firearm sound suppressors on the USML is contrary to the guiding principles of Export Reform and does not serve its purposes.** Suppressors should also be moved to the CCL, unless they are specifically designed for use only with firearms that remain on the USML.

<sup>1</sup> *District of Columbia v. Heller*, 554 U.S. 570, 592, 624-25 (2008). See also *McDonald v. Chicago*, 561 U.S. 742 (2010) (Second Amendment right to keep and bear arms is fully incorporated against state and local action by virtue of the Fourteenth Amendment).

<sup>2</sup> The Small Arms Survey estimates that as of the end of 2017, there were 121 firearms for every 100 residents in the U.S., for a total of some 393.2 million guns. The program director for the Small Arms Survey Institute notes, however, that “there is no direct correlation at the global level between firearm ownership and violence.” See Edith M. Lederer, “Global survey shows more than 1 billion small arms in world, mostly owned by civilians and mostly in the U.S.,” *ChicagoTribune.com*, June 18, 2018, <http://www.chicagotribune.com/news/nationworld/ct-survey-small-arms-world-civilians-20180618-story.html>.



- The designation of “high capacity magazines” that would remain on the USML is based on an arbitrary number, rather than any qualitative difference in the technology or military character of the item. The governing consideration should be whether they are specifically designed for use only with firearms that remain on the USML, not their capacity.
- Where manufacturers and exporters need to implement new compliance procedures for items moving from the USML to the CCL, the final rule should have a delayed implementation date; where requirements that once pertained under the International Traffic in Arms Regulations (ITAR) have no analogues under the Export Administration Regulations (EAR), the changes should take effect immediately.

For these reasons, and as detailed below, the NRA supports the proposal but advocates for minor revisions before its publication as a final rule.

**I. Firearm Sound Suppressors, As Such, Do Not Meet the Prerequisites for Control on the USML Articulated by the Proposal and Therefore Should be Controlled Under the CCL.**

As noted in its supplementary information, the proposal is part of a longstanding effort to “revise the U.S. Munitions List so that its scope is limited to those defense articles that provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use.” Whether or not sound suppressors for firearms are characterized as “weapons,” there is no plausible argument that the devices meet these standards.

A firearm sound suppressor is basically a metal cylinder surrounding internal baffles that slow and cool escaping gas to decrease the volume of the firearm’s muzzle report. The devices reduce, but do not eliminate, the sound of gunshots.<sup>3</sup> Suppressors have been commercially available since the first decade of the 1900s.<sup>4</sup> The technology necessary to produce them is simple and well-understood throughout the developed world. Detailed design, development, production, and manufacturing information for firearm sound suppressors is pervasively available in the public domain, including on the Internet.<sup>5</sup> Similar devices are used to moderate the sound of various other consumer products powered by internal combustion, including automobiles, chainsaws, and lawnmowers.

<sup>3</sup> Glenn Kessler, “Are firearms with a silencer ‘quiet’?” WashingtonPost.com, March 20, 2017, [https://www.washingtonpost.com/news/fact-checker/wp/2017/03/20/are-firearms-with-a-silencer-quiet/?hpid=hp\\_hp-top-table-main-silencer-silencer-cut-away%3Ahomepage%2Fstory&utm\\_term=.301e14951dd4](https://www.washingtonpost.com/news/fact-checker/wp/2017/03/20/are-firearms-with-a-silencer-quiet/?hpid=hp_hp-top-table-main-silencer-silencer-cut-away%3Ahomepage%2Fstory&utm_term=.301e14951dd4).

<sup>4</sup> Stephen Halbrook, “Firearm Sound Moderators: Issues of Criminalization and the Second Amendment,” 46 Cumb. L. Rev. 33, 42 (2015).

<sup>5</sup> A quick web browser search will reveal numerous webpages and videos offering detailed instructions on constructing suppressors of various levels of sophistication, from products produced with lathes and other machine tools to improvised models made from such materials as PVC, flashlight tubes, oil filters, and solvent traps. There’s even a detailed suppressor schematic on the ATF’s own website: <https://www.atf.gov/file/silencer-cut-away>.

Suppressors do not provide the United States with any critical military or intelligence advantage. They are not unique to the United States and are in fact the rare type of firearm-related product that historically has been regulated more closely in this country than in a number of other countries with otherwise relatively strict gun control laws. In some foreign countries, there are no special requirements to acquire or possess firearm suppressors; in certain others, they are presumptively available to those with a firearm license.<sup>6</sup> Firearm suppressors are already in use by military forces, law enforcement agencies, and civilian firearm owners across the world. Simply put, any country sophisticated enough to produce firearms is sophisticated enough to produce firearm sound suppressors.

Firearm sound suppressors, by themselves, are harmless and cannot accurately be classified as “weapons.” They are only useful when actually attached to a firearm. Even then, they do not make the firearm any more lethal. Their primary advantage is to protect the hearing of the firearm’s user and to decrease the sound signature of firearms so their use is less noticeable and has fewer collateral effects on those in vicinity of the firearm’s discharge.

And even assuming, for the sake of argument, suppressors could be characterized as “weapons,” they are not “inherently military.” Suppressors are regulated and taxed under U.S. law,<sup>7</sup> but they are readily available to those who are legally eligible to own firearms. They are lawful for private possession in 42 states and may be lawfully used for hunting in 40 states.<sup>8</sup> Suppressors adorn the firearms of plinkers, hunters, competitors, and law enforcement officers. According to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), there were 1,297,670 suppressors registered under the National Firearms Act as of February 3, 2017, with nearly 400,000 such registrations occurring in the 12 months preceding that date alone.<sup>9</sup> As previously mentioned, suppressors are also commonly used by law enforcement agencies and private firearm owners in other countries as well.

In its current form, the proposal does not differentiate between suppressors for use on firearms that would be regulated under the USML and those that would not. This could mean that firearms that would otherwise be regulated under the CCL will remain on the USML because they have integrated suppressors. It could also mean that firearm instructors would have to refrain from allowing suppressors to be used in their classes for fear of providing unauthorized “defense services.” This is contrary to the spirit and intent of Export Reform and does nothing to further U.S. or international security interests.

Given that there is no special military or national security significance to firearm sound suppressors, there is no convincing argument for retaining them on the USML. Like flash suppressors, they should be generally subject to the CCL. If they are going to be retained on the USML at all, it should only be to the extent that they are “specially designed” for the firearms

<sup>6</sup> 46 Cumb. L. Rev. at 72-4.

<sup>7</sup> See National Firearms Act, 26 U.S.C. §§ 5801-5872; Gun Control Act, 18 U.S.C. §§ 921-931.

<sup>8</sup> American Suppressor Association, Education Webpage, <https://americansuppressorassociation.com/education/> (last visited July 6, 2018).

<sup>9</sup> Stephen Gutowski, “ATF: 1.3 Million Silencers in U.S. Rarely Used I Crimes,” FreeBeacon.com, Feb. 17, 2017, <http://freebeacon.com/issues/atf-despite-nearly-1-3-million-silencers-united-states-rarely-used-crimes/>.

that would also continue to be so controlled. Because that distinction would be difficult to administer as a practical matter, however, the best option is simply to control the general category of firearm sound suppressors under the CCL.

## **II. The Proposal's Treatment of Magazines is Arbitrary and Capricious.**

The proposal treats magazines as “high capacity” and therefore subject to the USML if they have a capacity of greater than 50 rounds, “regardless of jurisdiction of the firearm.” It offers no explanation for this threshold. Whatever the thinking behind it may be, a 51-round magazine provides no greater critical military or intelligence advantage than a magazine of lesser capacity, nor is it any more inherently for military end use.

Magazines, whatever their capacity, are among the most simple and utilitarian of firearm-related items. In typical form, they consist of a metal box or tube with a floor plate that contains a spring with a follower at the top. A firearm that can accept a detachable magazine can accept a magazine of virtually any size. All that is necessary to create a magazine of greater capacity is a longer box and spring. Drum magazines typically utilize a cylindrical chamber and a wound spring or ratcheting mechanism to allow for greater capacity in a more compact unit, but neither configuration uses sophisticated or closely-held technology. Like firearm sound suppressors, technical data for magazines with capacities above and below 51 rounds is available in the public domain, including online, and has been since at least the early 20<sup>th</sup> Century.<sup>10</sup>

United States law does not limit the capacity of magazines for any sort of firearm available to private citizens (a handful of states, however, do impose magazine capacity limits, typically of 10 rounds). Magazines with capacities in excess of 50 rounds are readily available on the commercial market. They are used by practical shooting competitors, as well as by many gun owners who appreciate the versatility and convenience they provide. Even BB guns for the youth market that use springs or compressed air often have reservoirs that hold hundreds of rounds. While these non-powder guns obviously are not and would not be defense articles under the proposal, their capacity demonstrates the fact that marksmen of all types appreciate the ability to operate their guns without frequent reloading.

Demonstrating the arbitrary nature of controlling magazines based on their capacity is the fact that they can easily be clipped, taped, or otherwise attached to one another, with reloads accomplished in mere moments.

As with sound suppressors, it makes no sense that a given curriculum of firearm instruction that would otherwise be uncontrolled under the proposal could potentially be re-characterized as a “defense service” if it happened to involve a “large capacity” magazine.

<sup>10</sup> See, e.g., European Patent Office Patent No. 8172, “A New or Improved Cartridge Magazine for Small Arms and Machine Guns,” Accepted March 6, 1919 (providing detailed specifications for a drum-type magazine), available at <https://worldwide.espacenet.com/publicationDetails/originalDocument?CC=GB&NR=191508172A&KC=A&FT=D&ND=3&date=19190306&DB=EPODOC&locale=> (last visited July 6, 2018).



For these reasons, we recommend that firearm magazines be controlled under the CCL. If they are controlled under the USML at all, it should only be to the extent they “specially designed” solely for firearms that remain on the USML.

**III. The Final Rule Should Take Effect Immediately to the Extent Requirements Are Eliminated and Phase in Other Changes to Allow Regulated Entities Time to Adapt.**

When the final rule governing Categories I, II, and III of the USML is published, certain changes should take effect immediately, while others should be phased in to allow regulated entities time to adapt.

Changes that merely eliminate requirements altogether should take effect immediately. For example, there is no justification for continuing to make “manufacturers” of articles that would be moved off the USML register with the Department of State.

On the other hand, where control of an item changes from the USML to the CCL, necessitating new procedures by the regulated entity, implementation of the final rule’s effective date should be delayed to allow for new compliance systems to be established.

Licenses granted under the ITAR should also be grandfathered for all outstanding transactions.

The NRA does not have any specific recommendations for a timeline of implementation for enforcing new requirements and procedures. We will defer to the entities whose day-to-day operations will be directly affected by the changes in the final rule.

**Conclusion**

The NRA is very pleased to see Export Reform finally turn its attention to Categories I, II, and III of the USML. The proposal charts a positive course that will contribute to national security, enhance the competitiveness of U.S. businesses, and benefit ordinary gun owners by mitigating the potential for the ITAR to burden innocent conduct that does not implicate national security. We hope you will take the suggestions offered herein seriously to further promote the worthy goals of this effort, and we appreciate the opportunity to provide input.

We have also included our submission on the Bureau of Industry and Security’s companion rulemaking and incorporate those comments herein by this reference.

Sincerely,



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July 6, 2018

Regulatory Policy Division  
Bureau of Industry and Security  
United States Department of Commerce  
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Washington, District of Columbia 20230

Via Online Submission: <https://www.regulations.gov/document?D=BIS-2017-0004-0001>

Re: **Docket No. BIS-2017-0004; RIN 0694-AF47; Control of Firearms, Guns,  
Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)**

Greetings:

I am writing on behalf of the National Rifle Association (NRA) to provide the association's comments on the above proposed rule (the proposal). With some six million dues-paying members, the NRA is America's premier defender of the civil right protected by the Second Amendment. Our members include individuals and businesses that would be directly affected by the changes in the proposal, including gunsmiths, firearm instructors, journalists and writers covering firearm technology and development, hunters, competitive shooters, and manufacturers.

The NRA is very pleased to see that the project of Export Reform has finally circled back to the place where it began, with proposed amendments to Categories I, II, and III of the U.S. Munitions List (USML). These were among the first of the changes planned for the large-scale undertaking to update export controls on dual-use items, and rightly so. The Second Amendment protects an individual right to possess and carry firearms in case of confrontation, extending to

arms in common use among the population for lawful purposes.<sup>1</sup> America boasts hundreds of millions of privately-owned firearms<sup>2</sup> and a robust “gun culture” that has produced countless books, magazine articles, videos, websites, online forums, etc., that exhaustively detail firearm technology and use. It is difficult to imagine any information about the design, development, production, manufacturing, and use of firearms that is not already within the public domain. This same information is commonly available overseas, as are the types of firearms and ammunition the proposal would regulate under the Commerce Control List (CCL). Meanwhile, the might and sophistication of the U.S. military – as well as America’s armed populace – ensure that no foreign enemy wielding the types of arms at issue in these proposed regulations could pose a serious threat to this nation’s security.

Of course, movement of commonly-available firearms and ammunition to the CCL would not leave their export unregulated. America already has one of the most well-established and closely-administered systems of regulation for commercial production and distribution of firearms and ammunition in the world, and the proposal would not change that. It is clear from the proposal that items moving off the USML would remain closely controlled, with the necessity of export licenses remaining the norm. Foreign individuals’ access to firearms and ammunition would also remain regulated under the federal Gun Control Act and the National Firearms Act. Furthermore, the Commerce Department has long regulated exports of various shotguns, as well as their parts, components, accessories, and ammunition. Thus, it has existing knowledge of and relationships with many of the entities the proposal will affect. Those entities, in turn, will also have some familiarity with the Department’s regulatory environment and procedures.

The NRA believes that, on the whole, the proposal correctly balances the imperatives of national and global security, allocation of oversight resources, and promotion of American industry, innovation, and competitiveness. We do, however, think that it could be improved in several particulars. We also believe that the timing for the implementation of the rule deserves careful consideration.

Specifically, our concerns involve the following:

- **§ 740.9 Temporary imports, exports, reexports, and transfers (in-country) (TMP) and § 758. 10 Entry clearance requirements for temporary imports – The use of the Automated Export System (AES) is impractical and inappropriate for private travelers exporting a personal firearm they temporarily imported into the U.S. for**

<sup>1</sup> *District of Columbia v. Heller*, 554 U.S. 570, 592, 624-25 (2008). *See also McDonald v. Chicago*, 561 U.S. 742 (2010) (Second Amendment right to keep and bear arms is fully incorporated against state and local action by virtue of the Fourteenth Amendment).

<sup>2</sup> The Small Arms Survey estimates that as of the end of 2017, there were 121 firearms for every 100 residents in the U.S., for a total of some 393.2 million guns. The program director for the Small Arms Survey Institute notes, however, that “there is no direct correlation at the global level between firearm ownership and violence.” *See* Edith M. Lederer, “Global survey shows more than 1 billion small arms in world, mostly owned by civilians and mostly in the U.S.,” *ChicagoTribune.com*, June 18, 2018, <http://www.chicagotribune.com/news/nationworld/ct-survey-small-arms-world-civilians-20180618-story.html>.

lawful purposes. The current system, which relies upon the ATF Form 6NIA, should be maintained without modification for such persons.

- § 740.14 Baggage (BAG) and § 758.1 The Electronic Export Enforcement (EED) filing to the Automated Export System (AES) – The use of the AES is impractical and inappropriate for private travelers temporarily exporting a personal firearm for lawful purposes. The current system, which relies upon the CBP Form 4457, should be maintained without modification for such persons until such time as U.S. Customs and Border Protection engages in a public rulemaking process to resolve the current problems.
- § 758.1 The Electronic Export Enforcement (EED) filing to the Automated Export System (AES) and § 762.2 Records to be retained – Expanding the data elements necessary for AES filings would exacerbate the problems for private travelers temporarily exporting a personal firearm and violate the spirit of Congressional prohibitions against federal firearm registries. Private travelers temporarily exporting personal firearms should continue to be able to use the CPB Form 4457 without the firearm's information being captured by a federal database.
- Where manufacturers and exporters need to implement new compliance procedures for items moving from the USML to the CCL, the final rule should have a delayed implementation date; where requirements that once pertained under the International Traffic in Arms Regulations (ITAR) have no analogues under the Export Administration Regulations (EAR), the changes should take effect immediately.

For these reasons, and as detailed below, the NRA supports the proposal but advocates for revisions before its publication as a final rule.

#### I. The AES System is Impractical and Inappropriate for Use by Private Travelers.

- A. The AES requirement was introduced without sufficient or accurate notice to the public.

The International Traffic in Arms Regulations historically had included an exemption under 22 CFR §123.17(c) that allowed U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges therefor. This exemption was geared toward hunters, sportsmen, competitors, and others who travel overseas with firearms to be used for sporting and other lawful purposes.

In 2011, DDTC published a Federal Register notice of proposed rulemaking entitled International Traffic in Arms Regulations: Exemption for Temporary Export of Chemical Agent Protective Gear.<sup>3</sup> The supplementary information to that rulemaking focused on amendments to 22 CFR §123.17 pertaining to “the temporary export of chemical agent protective gear for

<sup>3</sup> 76 Fed. Reg. 16353 (March 23, 2011).



exclusive personal use ... .” It also mentioned that “an exemption for firearms and ammunition is clarified by removing certain extraneous language that does not change the meaning of the exemption.”<sup>4</sup>

In fact, the proposed change to the firearms and ammunition exemption was a material and substantial change to the status quo. It would require for the first time that “the individual must ... present the Internal Transaction Number (ITN) from submission of the Electronic Export Information in the Automated Export System per § 123.22(b)” to use the exemption.<sup>5</sup>

But because the notice only printed the amendments to 22 CFR §123.17 and omitted the existing text of that section, it was not clear from the face of that notice what the context of this new requirement was. The notice’s inaccurate portrayal of the change as a mere “clarification” further contributed to obscuring the significance of this new language. Thus, the new requirement for temporary firearms and ammunition exports went largely unnoticed by relevant stakeholders.

The final rule was published on May 2, 2012.<sup>6</sup> Its supplementary information included a similarly inaccurate description of the firearm exemption amendment. “Section (c)(3) is revised to remove what is in practice extraneous language,” it stated.<sup>7</sup> “Subject to the requirements of (c)(1)–(3), the exemption applies to all eligible individuals (with the noted exceptions). Thus, while the text is revised, the meaning of (c)(3) is not changed.”<sup>8</sup>

Unlike the notice for the proposed rule, however, the notice of the final rule included the full text of subsection (c), which made clear the AES filing requirement pertained to those claiming the licensing exemption for temporary firearm and ammunition exports. Of course, it was by then too late for stakeholders to object to these changes, as the rule had been finalized.

For three years, the changes to 22 CFR §123.17 as they pertained to temporary firearm and ammunition exports appeared to be ignored and unenforced by the federal government. Then, in 2015, U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP) suddenly changed their websites to indicate the AES filing requirements would be enforced against travelers temporarily exporting firearms and ammunition, with penalties that could include seizure of improperly declared items and criminal prosecution.<sup>9</sup>

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 16354.

<sup>6</sup> Amendment to the International Traffic in Arms Regulations: Exemption for Temporary Export of Chemical Agent Protective Gear, 77 Fed. Reg. 25865-01 (May 2, 2012).

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> See NRA-ILA, “Rule Change May Devastate International Travel for Hunters and Shooters,” <https://www.nra-ila.org/articles/20150320/rule-change-may-devastate-international-travel-for-hunters-and-shooters> (March 20, 2015).

B. The AES was not designed for use by private persons for non-business purposes.

The AES was designed around the needs of commercial exporters and government officials, not private travelers. As CBP's "Introduction" to the AES states:

*During AES development, a Trade Resource Group convened regularly. To ensure that all voices were heard, the group was comprised of large and small exporters, carriers, freight forwarders, port authorities, and non-vessel operating common carriers (NVOCC). At the trade's request, separate coalitions for exporters and software vendors were formed.<sup>[10]</sup>*

It continues, "Whatever aspect of the export community you represent - exporter, carrier, freight forwarder, port authority, service center, non-vessel operating common carrier, consolidator - AES has advantages for you."<sup>11</sup> Nowhere does this summary recognize that private individuals would also have to navigate a system designed by and for industry compliance specialists.

Individuals attempting to use the AES will need to have compatible hardware and software systems or to enlist the services of an authorized agent. Those who do not wish to purchase or write their own software, or hire someone to complete the filing process for them, have the option of using AESDirect, an online version administered by the U.S. Census Bureau.

That agency, in turn, has a webpage with various resources to acquaint users with the intricacies of the system.<sup>12</sup> Browsers can start, for example, with the 39-page *AESDirect User Guide*<sup>13</sup> or with any of the one-hour-plus webinars that cover various aspects of the system.

Navigating the filing process requires individuals to create an account and then fill in data fields with various codes that are neither intuitive nor easily reconcilable with the context of an individual traveling with his or her own private property. For example, the system requires the parties to an export to be identified, with required fields that include the U.S. Principal Party in Interest, which must be identified by "Company Name" and an acceptable ID type. Likewise, the Ultimate Consignee also must be specified, again with reference to "Company Name" and an authorized form of identification.

Nowhere does the User Guide or the screens of the system itself explain how these categories are supposed to translate for private individuals declaring temporary exports of their

<sup>10</sup> U.S. Customs and Border Protection, "AES: An Introduction," <https://www.cbp.gov/trade/aes/introduction> (last visited July 6, 2018).

<sup>11</sup> *Id.*

<sup>12</sup> U.S. Census Bureau, "ACE AESDirect – Resources," [https://www.census.gov/foreign-trade/aes/aesdirect/transit/outoacc.html?cml=gd&utm\\_medium=email&utm\\_source=govdelivery](https://www.census.gov/foreign-trade/aes/aesdirect/transit/outoacc.html?cml=gd&utm_medium=email&utm_source=govdelivery) (last visited July 6, 2018).

<sup>13</sup> Available at <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf> (last visited July 6, 2018).

own property. Such persons are not just an afterthought in the system's design. Rather, it appears that the design has not thought of them at all.

The acceptable forms of identification, for example, are an Employer Identification Number (EIN), a Dun and Bradstreet Number, or a foreign passport number (if the foreign entity is in the U.S. at the time the goods are purchased or obtained for export). U.S. individuals making temporary exports cannot use their own passport numbers, nor can they use their Social Security numbers.<sup>14</sup>

Using AESDirect, moreover, requires an individual to apply for an account with the Secure Data Portal of the Automated Commercial Environment. The application for an ACE Exporter Account<sup>15</sup> requires users to list "Corporate Information," including an EIN and Company Name.

The Internal Revenue Service (IRS) is responsible for issuing EINs. The IRS website that explains the process for applying online clearly states: "Employer Identification Numbers are issued for the purpose of tax administration and are not intended for participation in any other activities."<sup>16</sup> The online application requires the applicant to identify the "legal structure" associated with the EIN. None of the available options corresponds with a private individual who simply wishes to make an AES filing. The applicant then must specify why he or she is requesting an EIN, with the limited menu choices again offering no option for the private AES filer. Finally, the applicant must certify under penalties of perjury that he or she has "examined this application, and to the best of my knowledge and belief, it is true, correct, and complete."<sup>17</sup>

Private individuals using the online application form, in other words, must make a false certification to the IRS about their business need for an EIN as a prerequisite to complying with the legally-mandated AES filing requirement. These individuals are also potentially creating an expectation with the IRS that they are creating a business that should have associated tax filings.

C. The relevant agencies have been aware of the problems private individuals have using the AES, and there has been no apparent progress in resolving them.

In 2015, representatives of the NRA – as well as representatives of hunting and firearm industry associations – met with officials from CBP, the Census Bureau, the Department of

<sup>14</sup> See U.S. Customs and Border Protection, "Change in Automated Export System (AES) exporter ID filing requirement," [https://help.cbp.gov/app/answers/detail/a\\_id/1145/kw/EIN%20number%20needed%20for%20export](https://help.cbp.gov/app/answers/detail/a_id/1145/kw/EIN%20number%20needed%20for%20export) (last visited July 6, 2018).

<sup>15</sup> Available at [https://ace.cbp.dhs.gov/acepub/acepub\\_Apps/ExporterAccountApplication/expForm.cbp](https://ace.cbp.dhs.gov/acepub/acepub_Apps/ExporterAccountApplication/expForm.cbp) (last visited July 6, 2018).

<sup>16</sup> IRS, "Apply for an Employer Identification Number (EIN) Online," <https://www.irs.gov/businesses/small-businesses-self-employed/apply-for-an-employer-identification-number-ein-online> (last visited July 6, 2018).

<sup>17</sup> See IRS Form SS-4, available at <https://www.irs.gov/pub/irs-pdf/ss4.pdf> (last visited July 6, 2018). Note the PDF of the SS-4 has options for "Other (specify)" not available on the IRS's online application form. It does not, however, indicate that EINs may be obtained solely for AES filing purposes.

Homeland Security (DHS), and ICE to discuss the above problems.<sup>18</sup> These discussions emphasized the need for a simple, straightforward, and legal means for private travelers to comply with their AES filing requirements. The discussions also touched on concerns about creating a federal firearm registry via AES filings (a topic that is explored below in greater depth).

Shortly after that meeting, and after additional intervention from members of Congress, CBP announced that it would return to the status quo practice of using the paper CBP Form 4457 to track firearms for temporary export.<sup>19</sup> In this procedure, travelers report to a CBP office during their trip or beforehand at a Port of Entry and present the firearms (and ammunition, if applicable) to be recorded on the 4457. Upon return to the U.S., the traveler will declare the property, which can be checked, if necessary, against the 4457 to ensure the same firearms that left the country have returned. The ATF has also indicated that this procedure will satisfy the re-importation of firearms under its importation jurisdiction.<sup>20</sup>

We understand that this remains the procedure for temporary firearm exports by private travelers to the present day and that the AES filing requirement is not being enforced against these individuals.

Between 2015 and the present, NRA representatives have had repeated contacts with officials from CBP and the Census Bureau to inquire about any changes or updates to the above-described state of affairs. To date, we have neither seen nor heard of any evidence that the AES system has been in any way modified to alleviate the problems it presents for private travelers. Our review of the applicable websites during the preparation of these comments confirms this impression. The AES remains a complex application geared toward the needs of industry and government, not private persons traveling with their own property for non-business purposes.

- D. BIS should omit the AES filing requirement for private persons temporarily exporting their own firearms and ammunition for lawful purposes and codify the Form 4457 procedure.

The NRA is pleased to see that BIS' current proposal is handling the AES issue in a much more transparent and forthright manner than the 2012 DDTC rulemaking that introduced it in the first place. The background information included with the proposal acknowledges:

*BIS is aware that U.S. Customs and Border Protection (CBP) has temporarily suspended the requirement to file EEI to the AES for personally-owned firearms and ammunition that are "subject to the ITAR" being exported under 22 CFR 123.17(c), due to*

<sup>18</sup> See NRA-ILA, "You Can't Get There from Here: Obama Administration Shrugs Off Woes of International Travelers," <https://www.nra-ila.org/articles/20150417/you-cant-get-there-from-here-obama-administration-shrugs-off-woes-of-international-travelers> (April 17, 2015).

<sup>19</sup> See, e.g., P.J. Reilly, "U.S. Government withdraws confusing new gun rules for traveling hunters," LancasterOnline, April 27, 2015, [https://lancasteronline.com/news/local/u-s-government-withdraws-confusing-new-gun-rules-for-traveling/article\\_e2991fcs-ecce-11e4-8e21-3b622f277d23.html](https://lancasteronline.com/news/local/u-s-government-withdraws-confusing-new-gun-rules-for-traveling/article_e2991fcs-ecce-11e4-8e21-3b622f277d23.html).

<sup>20</sup> See 27 C.F.R. § 478.115(a).



*operational challenges related to implementation. ... Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP's existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition.*

As explained above, the CBP and the other relevant agencies have not updated their processes to allow for individuals to easily file Electronic Export Information in the AES. Given that they are aware of the issues, have had more than three years to fix them, and have made no discernable progress in that direction, there is no reason to believe they will do so by the time the proposal is published as a final rule.

The NRA is unaware of any compelling security need to change the status quo. The very fact that the systems have not been updated to address the outstanding issues would seem to indicate CBP and DHS agree. Simply put, there has been no urgency to facilitate AES filings by private travelers. The Form 4457 procedure has proven to be a workable system both before and since the 2012 rule change, and it can continue to suffice for the near term.

The paper Form 4457 also serves an important function for some U.S. travelers to foreign countries that require a valid "firearm license" from visitors' home countries. Neither the U.S. government nor most U.S. states generally license the acquisition or simple possession of firearms, especially long guns. But foreign officials in these countries have historically accepted the Form 4457 as fulfilling this requirement.

It is also relevant that BIS has throughout the relevant time period always allowed for the temporary export of shotguns and shotgun shells under its jurisdiction via the baggage exemption of 15 C.F.R. § 740.14 without requiring a declaration to be filed in the AES. Indeed, that exemption currently does not specifically require the use of the Form 4457 procedure, either. Codifying the Form 4457 procedure would therefore help promote consistency and understanding across the different agencies involved in enforcing the nation's export rules and with the traveling public. The president's determination that certain additional firearms and ammunition no longer warrant control under the USML more strongly argues in favor of BIS adopting its own procedures for their temporary export than for importing procedures from the ITAR into the EAR.

CBP can also issue its own rulemaking on procedures for temporary exports by private travelers, should the state of play change with respect to the practical and technological issues of the AES. The issue could then be fully vetted in its own right. There is no reason, however, to inject this thorny issue into the larger project of Export Reform. It is not necessary nor helpful to the objectives of Export Reform, and it would perpetuate a problem one solution to which has already been identified (i.e., the paper Form 4457 procedure).

- E. Private travelers exporting a personal firearm they temporarily imported into the U.S. for lawful purposes should not be required to use AES for this purpose.

The same problems that arise from requiring U.S. persons to file declarations through the AES to take advantage of the BAG exemption apply to requiring foreign visitors traveling to the U.S. with their own firearms to use the AES to avail themselves of the TMP exception. This is not necessary under the current version of 15 C.F.R. § 740.9, and it should not be added to that section or to § 758.1.

Currently, foreign visitors traveling to the U.S. with their own firearms must apply for an import permit from the Bureau of Alcohol, Tobacco, Firearms & Explosives using ATF Form 6NIA. The individual will also have to substantiate his or her eligibility to possess a firearm in the United States as a non-U.S. person (for example, by obtaining a hunting license from a U.S. state). The travelers must then declare their firearms at the border, provide CBP officials with any required documents, and maintain the required documents during the duration of their stay. Customs officials in the country of re-importation can use the ATF Form 6NIA to confirm that the individual is returning with the same firearms that were brought to the U.S.

We are unaware of any attempt on DDTC's part to enforce a requirement that foreign visitors (including from Canada) declare the "export" of firearms they temporarily brought to the U.S. for lawful purposes through the AES when the visitor returns home. Indeed, it is difficult to understand how doing so would contribute to national security. Thanks the Second Amendment and America's unique commitment to individual liberty, the U.S. has by far the largest civilian stock of firearms in the world.<sup>21</sup> Given the ready availability of firearms in the U.S. as compared to the rest of the world, there is little chance that America's interests are seriously threatened by foreign visitors bringing their own lawfully obtained guns into the country. At the very least, they are not threatened enough to impose a bureaucratic requirement for private foreign travelers that has already proven unworkable for their U.S. counterparts.

For these reasons, we urge BIS to omit from §§ 740.2 and 758. 10 the AES declaration requirement as applied to private foreign travelers temporarily bringing personal firearms into the U.S. Foreign hunters and competitive shooters help contribute to the U.S. economy, and these proposed changes would discourage them from doing so. Meanwhile, reports of foreign travelers committing crimes in the U.S. with firearms they lawfully brought with them are vanishingly rare.

**II. The expanded data elements necessary for AES filings exacerbate the problems for private travelers forced to use the system and violate the spirit of Congressional prohibitions against federal firearm registries.**

The proposal would "expand the data elements required as part of an AES filing for [firearms transferred from the USML] to include serial numbers, make, model and caliber," including for those wishing to use the BAG and TMP exemptions. This makes the previously mentioned problems with AES filing that much worse. It also runs counter to the spirit of clearly

<sup>21</sup> Lederer, *supra* note 2.

established Congressional policy against using bureaucratic record-keeping requirements to establish firearms registries.

Firearm registries have long been anathema to gun owners as a tool that can be used to target them for discrimination and for the eventual seizure of their firearms. History is rife with examples of tyrants who used civilian disarmament to further their despotic ends,<sup>22</sup> and America's own Revolutionary War began in earnest after a British raid on Colonial arms caches. Against this backdrop, federal gun control laws have consistently maintained a policy against national registries of the sorts of common arms with which Americans typically exercise their Second Amendment rights.<sup>23</sup>

Congress, in enacting the Gun Control Act of 1968 (GCA), specifically declined to create a federal firearm registry, despite the urging of President Lyndon B. Johnson to do so.<sup>24</sup> Both the House and the Senate voted down proposals to require registration of guns as the legislation made its way through Congress.<sup>25</sup> As Sen. James McClure later stated,

*The central compromise of the Gun Control Act of 1968—the sine qua non for the entry of the Federal Government into any form of firearms regulation was this: Records concerning gun ownership would be maintained by dealers, not by the Federal Government and not by State and local governments.*<sup>[26]</sup>

Congress then amended the GCA in 1986 to prohibit any rule or regulation enacted under its auspices from using the records that federal firearm licensees must keep to establish “any system of registration of firearms, firearms owners, or firearms transactions or dispositions ....”<sup>27</sup>

When the Brady Handgun Violence Protection Act of 1993<sup>28</sup> created the authority for the National Instant Criminal Background Check System (NICS), Congress took pains to ensure the system would not circumvent the GCA's policy against firearm registration. The Act states that if the NICS determines receipt of a firearm would not be in violation of law, it shall “destroy all records of the system with respect to the call (other than the identifying number and the date the

<sup>22</sup> See, e.g., STEPHEN HALBROOK, GUN CONTROL IN THE THIRD REICH, DISARMING THE JEWS AND “ENEMIES OF THE STATE” (Independent Inst. 2013).

<sup>23</sup> The National Firearms Act, 26 U.S.C. §§ 5801-5872, requires federal registration of limited categories of arms, but to the extent it covers firearms, those guns— which include machineguns, short-barreled shotguns, short-barreled rifles, and non-sporting firearms greater than .50 caliber — are comparatively rare among the U.S. civilian firearm stock.

<sup>24</sup> See Lyndon B. Johnson, “Remarks Upon Signing the Gun Control Act of 1968,” Oct. 22, 1968, available at <http://www.presidency.ucsb.edu/ws/?pid=29197> (last visited July 6, 2018).

<sup>25</sup> 114 Cong. Rec. H22267 (daily ed. July 19, 1968); 114 Cong. Rec. S27420-421 (daily ed. Sept. 18, 1968).

<sup>26</sup> 131 Cong. Rec. S9163-64 (July 9, 1985).

<sup>27</sup> 18 U.S.C. § 926(a).

<sup>28</sup> Pub. L. No. 103-159, 107 Stat. 1536 (1993).

number was assigned) and all records of the system relating to the person or the transfer.”<sup>29</sup> Section 103(i) of the Act contains additional prohibitions against the use of the system to create a federal firearms registry:

*No department, agency, officer, or employee of the United States may—*

*(1) require that any record or portion thereof generated by the system established under this section may be recorded at or transferred to a facility owned, managed, or controlled by the United States or any State or political subdivision thereof; or*

*(2) use the system established under this section to establish any system for the registration of firearms, firearm owners, or firearm transactions or dispositions except with respect to person, prohibited by section 922 (g) or (n) of title 18, United States Code State law, from receiving a firearm.<sup>[30]</sup>*

Beginning in 1979, the annual appropriations bills that funded the ATF and its predecessor agency prohibited the Department of Justice from centralizing the records of federal firearm licensees (FFLs), until the prohibition was made permanent in 2011.<sup>31</sup> Also made permanent in that 2011 appropriations bill was another rider that prohibited the ATF from compiling a searchable registry of gun buyers’ names from business records transferred to the agency by FFLs who ceased doing business.<sup>32</sup> A third provision in the same bill permanently created a 24-hour deadline for the destruction of identifying information on those who successfully undergo a NICS check.<sup>33</sup>

Even Obamacare contains a number of provisions that prohibit information collected under its authority from being used to create firearm registries.<sup>34</sup>

Meanwhile, there is no express authority in the enabling act under which this rulemaking is promulgated for BIS to collect and retain detailed information on the firearms owned by law-abiding Americans. Yet BIS is proposing to compel Americans to enter identifying information about themselves and their firearms into a federal database as a precondition of engaging in lawful travel with firearms. Individuals forced to comply with this requirement are given no assurances about how the information will be retained or protected or whether it will be available to other entities, and if so, under what circumstances. This clearly runs contrary to the spirit of congressional policy governing the handling of firearm owner information.

<sup>29</sup> 18 U.S.C. 922(t)(2)(C).

<sup>30</sup> 107 Stat. at 1542.

<sup>31</sup> Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. No. 112-55, 125 Stat. 552, 609 (2011).

<sup>32</sup> 125 Stat. 552, 610.

<sup>33</sup> *Id.* at 632.

<sup>34</sup> Patient Protection and Affordable Care Act, Pub. L. No. 111-148, 124 Stat. 119, 884-5 (2010).



The *de facto* federal firearm registry that would be created by forcing private gun owners to make detailed declarations about themselves and their firearms via the AES is another argument in favor of retaining the current procedure utilizing the paper Form 4457. That procedure vindicates the government's legitimate interest in monitoring the firearms that move and in out of the country but does not require the government to maintain a central registry of firearm owner information.

Going forward, any further attempt to automate the information private travelers must provide about their personal firearms should include express privacy provisions. At a minimum, these should prevent the dissemination or transfer of the information to other entities and require its complete destruction once CBP has verified that the firearms which were temporarily exported have been returned to the U.S.

For all these reasons, the NRA objects to the proposal's use of expanded data elements for private travelers seeking to utilize the BAG or TMP exceptions and urges that those requirements be omitted from the final rule.

### **III. The Final Rule Should Take Effect Immediately to the Extent Requirements Are Eliminated and Phase in Other Changes to Allow Regulated Entities Time to Adapt.**

When the final rule governing Categories I, II, and III of the USML is published, certain changes should take effect immediately, while others should be phased in to allow regulated entities time to adapt.

Changes that merely eliminate requirements altogether should take effect immediately. For example, there is no justification for continuing to make "manufacturers" of articles that would be moved off the USML register with the Department of State.

On the other hand, where control of an item changes from the USML to the CCL, necessitating new procedures by the regulated entity, implementation of the final rule's effective date should be delayed to allow for new compliance systems to be established.

Licenses already granted under the ITAR should also be grandfathered for all outstanding transactions.

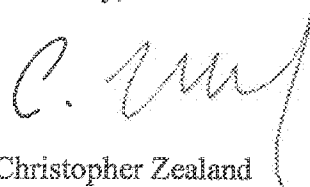
The NRA does not have any specific recommendations for a timeline of implementation for enforcing new requirements and procedures. We will defer to the entities whose day-to-day operations will be directly affected by the changes in the final rule.

### **Conclusion**

The NRA is very pleased to see Export Reform finally turn its attention to Categories I, II, and III of the USML. The proposal charts a positive course that will contribute to national security, enhance the competitiveness of U.S. businesses, and benefit ordinary gun owners by mitigating the potential for export regulations to burden innocent conduct that does not implicate national security. We hope you will take the suggestions offered herein seriously to further promote the worthy goals of this effort, and we appreciate the opportunity to provide input.

We have also included our submission on the Directorate of Defense Trade Control's companion rulemaking and incorporate those comments herein by this reference.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Zealand", with a long, sweeping horizontal stroke extending to the right.

Christopher Zealand  
Senior Research Attorney  
NRA-ILA

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-e2jd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2627

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** M Perlmutter

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-yhc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2628

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Baker

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## General Comment

U.S. firearms exported to Mexican police have been used in massacres and forced disappearances. We need international background checks to prevent gun exports to military and private groups that use them to commit violence or collude with organized crime.

At the core of these proposed changes is the mistaken belief that firearms do not merit tighter control because they are neither high-tech nor provide unique military advantages. In reality, these are some of the weapons most often used to commit abuses and extend conflict around the world. As such they deserve our highest scrutiny, not an easier path for sale and one without Congressional oversight. The policy continues the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

"The Trump administration's decision to relax regulations on the export of firearms will make it easier for terrorists, tyrants and criminal gangs to get their hands on the same dangerous firearms that have been used in mass shootings in the United States. This is a victory for the NRA and the gun industry and a loss for everyone else. Relaxing regulations on many firearms by putting them under the jurisdiction of the Commerce Department rather than the Department of State will make it harder to track where these weapons end up, and therefore easier for them to be diverted into the wrong hands. To make matters worse, Congress would no longer even be notified of major firearms exports, making it harder to do things like limit sales to the police in the Philippines who have been involved in assassinations of their own citizens -- as Sen. Ben Cardin, who blocked such sales in the past, has noted.

O, let America be America again --  
The land that never has been yet --  
And yet must be -- the land where every [one] is free.  
Langston Hughes, Let America Be America Again



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-gdf7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2629

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vincent Bergan

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## General Comment

As a US citizen I am opposed to the new regulations which make it easier to sell high tech American made weapons overseas. It is dangerous because those weapons could easily get into the wrong hands and be used against Americans.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-222x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2630

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Couch

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting

made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-mvip Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2631

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Mitchell

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military yet semi-automatic rifles are used in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns as well as any larger caliber firearm. Six U.S. states, DC, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by Congress to regulate the export of arms as the rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons which will limit its ability to comment on related human rights concerns, as it recently did on Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017 letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. The government taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking which will make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls for gun exports and would eliminate the State Departments

Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale but the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-tcnq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2632

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thomas Lorioux

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Thank you

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-dyhs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2633

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erin DeKlotz

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-3fdd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2634

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Heinz

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## General Comment

SIR/MADAM:

I oppose this rule change that would switch the regulations of firearms export from the US State Department to the US Commerce Department! It would eliminate the State Department's "Blue Lantern" program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would remove licensing requirements for brokers, increasing the risk of trafficking. Finally, it would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws. Since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the US and around the globe.

This seems like we are assisting a Russian Organized crime ring again!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-5ek5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2635

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Claudia Gibson

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## General Comment

Please do not unleash gun sales on the world & end up with thousands being killed JUST LIKE WHAT HAPPENS EVERY WEEK IN AMERICA!! The NRA should be sued for promoting death! And take theyre tax free status! Theyre totally political!  
Fuck trump!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-f3z9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2636

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Fretwell

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## General Comment

Export weapons should not be under Department of Commerce. They are not to be trusted.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-8fn6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2637

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Skiles

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-8xrp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2638

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donna Shuey

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## General Comment

I generally oppose regs that would make it easier to export guns from the US so I oppose any changes to current rules and regs.

Ex, Congress no longer being notified about large weapons sales is not acceptable.

The changes would present fewer obstacles for crime organizations to purchase large caches of weapons.

Removing liscensing requirements is also a problem in my opinion.

None of the rule changes are acceptable and I urge you to oppose them.

Thank you

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-8vu5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2639

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Miller

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous! They are used to kill people every day around the world in acts of terrorism, organized crime, political violence and human rights violations. They should be subject to more controls, not less. The Commerce Department does not have the resources to adequately enforce export controls.

This rule change would remove essential safe safeguards that help keep extra-legal agents from obtaining the weapons that fuel violence that destabilizes countries and causes mass migration.

Please do the right thing and forgo this disastrous rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-zc6c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2640

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diana Smith

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## General Comment

I do not support switching the regulation of firearms exports from the State Department to the Commerce Department. This change facilitates exporting firearms to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Is America into making money for arms deals, or are we for stabilizing the nations on this earth, reaching for democratic peace for all.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-4m7c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2641

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dawn Prosser

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-ggnr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2642

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roger Fretwell

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-hf5p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2643

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michelle Mitchell

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## General Comment

As a concerned citizen, I oppose the NRA's push to move export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. I believe this transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are classified as military", which allows Congress to block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Finally, this rule change would eliminate some very important State Department programs, including; the State Departments Blue Lantern program, the licensing program for brokers, and the block on 3D printing of firearms. The bottom line is that firearms are extremely dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-v5mo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2644

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Knudson

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## General Comment

: I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-ftzw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2645

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Black

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-ekqk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2646

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Heather Mulkerns

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. As a mother I am very concerned about gun violence in this country.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-dhs1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2647

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Felicia Feingersch

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Stop making guns easier to get!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-h4pb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2648

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** virginia Feldman

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## General Comment

As a pediatrician, parent, and grandparent, I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in, increased health costs, environmental degradation, & lives..

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-opox Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2649

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brenda Smith

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## General Comment

I oppose the transfer gun export licensing from an agency (State Department) with a mission to promote stability, conflict reduction, and human rights, to an agency (Commerce Department) with a mission to promote trade and which lacks the resources to adequately enforce export controls. The propose agency is to promote commerce in this case -- weapons. There is enough conflict in the world; there is no need for more weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-lulp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2650

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Calli Madrone

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-zolk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2651

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ryan Taylor

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## General Comment

The proposed rule change:

- \* Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- \* Eliminates Congressional oversight for important gun export deals.
- \* Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- \* Removes statutory license requirements for brokers, increasing risk of trafficking.
- \* Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- \* Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- \* The Commerce Department does not have the resources to enforce export controls, even now.
- \* Reduces transparency and reporting on gun exports.
- \* Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-86h9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2652

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-ky5z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2653

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steven Bell

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-q2uz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2654

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Heaney

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-txfo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2655

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jerry Charlson

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-sdbi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2656

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ronald Lynn White

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## General Comment

Please make sure that the proposed rule change DOES NOT:

Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminate Congressional oversight for important gun export deals.

Transfer the cost of processing licenses from gun manufacturers to taxpayers.

Remove statutory license requirements for brokers, increasing risk of trafficking.

Reduce or eliminate end-use controls, such as State Depts Blue Lantern program, or eliminates registration of firearms exporters.

Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Give the Commerce Department the responsibility to enforce export controls over semi-automatic assault rifles.

Reduce transparency and reporting on gun exports.

Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944t-r4eg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2657

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. Military style weapons like the AR 15 belong in the hands of US Military personel, not private citizens and not terrorists and crimals abroad.

This is yet another move that puts the profits of the US gun industry ahead of the US people and the people world wide. I thought Presiden Trump was going to drain the swamp rather than relocate it to his administration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944t-p3ul Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2658

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Foster

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## General Comment

What's being prepared is bad!

Potential points to make are that the proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals. Transfers the cost of processing licenses from gun manufacturers to taxpayers. Removes statutory license requirements for brokers, increasing risk of trafficking. Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. Reduces transparency and reporting on gun exports. Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944t-kmg5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2659

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Lindley

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## General Comment

If this proposed rule reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and eliminates registration of firearms exporters, a requirement since the 1940s, we will contribute to instability and threats to safety in other countries. That will only add to the need for immigrants and those seeking asylum in our country to flee their dangerous situations. Increasing the risk of arms trafficking is never in our best interests nor those of countries to which we export.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-tdc2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2660

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Allison Fradkin

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-tdet Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2661

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leah Elkins

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## General Comment

This new rule would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international terrorists and criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of the gun industry. I am appalled at this administrations capitulation to the gun lobby which is now turning to the international market as gun sales decline in the US. I am concerned that the proposed rule does not adequately address our national security, foreign policy, international crime and terrorist threats. Congress and the public must be able to understand the impact of these rules on potential firearm exports. The proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-4gru Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2662

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chris Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-zaf2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2663

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** BRUCE ALDER

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-mowr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2664

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tenille Woodward

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-3rev Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2665

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Ayers

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We shouldn't have assault style weapons available to individuals at home or abroad as they were designed as weapons of war, and as such should be restricted to military use. Why facilitate deranged parties acts of mass murder whether it be at home ore elsewhere?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-nvem Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2666

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nathaniel Watkins

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## General Comment

I oppose this regulation change. The only parties who stand to benefit are arms manufacturers. Meanwhile, the lax enforcement capabilities of the Department of Commerce will make it easier for US made arms to find their way into the hands of people who would use them against us.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-r8ir Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2667

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** B.L. Melton

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## General Comment

I oppose the proposed change of export licencies from the State Department to the Commerce Department. This transfer includes assault weapons and other powerful firearms and will make it easier to export U.S. guns and ammunition globally. These exported firearms are already being used in crimes, attacks and human rights violations in many other nations.

A change to the Commerce Department will increase the number of export applicants by 10,000 annually, according to the Dept. of Commerce estimates. This change will only benefit the arms business, and cause many more deaths and destruction worldwide.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-aqgl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2668

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Schoene

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S.

Commerce Department. What is the purpose of making this change -- the export of many more firearms, including weapons

of mass murder? Isn't it enough that America is drenched in privately-owned guns -- including assault rifles -- and suffers

from the highest rates of gun violence and gun deaths in the world -- by a mile? We want to infect the rest of the world with

our unique kind of insanity? Well I say "NO we do not!"

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944x-h8ci Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2669

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lynn Baldwin

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944x-s54y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2670

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Valerie Cooper

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944y-7vwa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2671

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erika Benda

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-3pl5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2672

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dale Goodno

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## General Comment

I am in favor of moving export license oversight for firearms from the State Department to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-czqc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2673

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robin Kline

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-n9hb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2674

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Kaszyca

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Our country is flooded with weapons already and now we want to flood the world with even more. Obviously this is about profit for the weapons industry and does nothing but make our already dangerous world more dangerous. This rule change is unacceptable and I expect someone there knows it.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-l8fu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2675

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marilyn Livingston

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## General Comment

Dear sir

I am writing to oppose the proposed changes to the regulation of domestic Firearm sales to foreign purchasers. The United States has supplied weapons to foreign groups in the past only to have those same weapons used against our own military personnel. Mistakes were made in the past but I would rather arms sales were regulated by the State Department whose aim is to protect the safety of our nation. The Commerce Department has a goal of increasing our sales and isn't tasked with determining whether those sales constitute a future danger to our country.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9450-80cc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2676

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Megan Epperson

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9450-qa2q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2677

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Megan Epperson

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9450-53dn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2678

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andy Winger

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## General Comment

The price is too high ... in lives destroyed. The arms industry relies on our government to pass legislation that helps them and hurts the rest of us. Modern governments should have the people's best interests in mind. That's what our founding father's risked their lives for.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-7cvn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2679

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Dortenzio

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-w3e5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2680

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kelly Warnberg

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## General Comment

I am disgusted that the United States seems to be determined to share its gun problem with the rest of the world! I am strongly opposed to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rule's elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobby's influence in the rule's description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my power peacefully and democratically to hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-vl4t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2681

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dave Riley

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-b7xs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2682

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Mindell

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-998b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2683

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Brenner

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

Elizabeth Brenner 97232

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-onbx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2684

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Kleinschmidt

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-45ix Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2685

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please, please no! I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-3vjo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2686

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Whitter

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-3s5j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2687

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thomas Stibolt

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## General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates critical Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. This change seems poorly thought out and completely unnecessary.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-uv2d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2688

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Brackett

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The public needs MORE information not less about firearms both domestically and internationally.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

I think the level of criminality in Central America and Mexico has been partially enabled by guns from the USA ending up in gangs and drug cartels. This has also encouraged the surge in Asylum seekers. Lets not make gun sales easier.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-gsn3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2689

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jacqueline Brandt

**Organization:** Ms.

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## General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the US taxpayers; enables 3D printing of firearms and allows weapons of war to more easily proliferate throughout the world. The rule change significantly increases profits to the American gun industry while the entire world pays the cost in lives. The ethical choice is clear.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-5ggs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2690

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Polly Robinson

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-dy71 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2691

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Walter Mintkeski

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

Nate Smith, Chair of the Military, Security and Police Transfers Thematic Group at Amnesty International USA, said of the proposed rule changes: While these changes are somewhat obscure and bureaucratic, they pose very concrete and real risks to human rights and peace efforts around the world and to national security here in the US.

Please heed Mr. Smith's warnings.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-uphs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2692

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thomas Callanan

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## General Comment

Stop this crazy proliferation of guns.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-q0kd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2693

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Stone

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## General Comment

I join all those Americans who ask you to reject this proposed rule.

This proposal would make it easier to export U.S. guns and ammunition globally, even though U.S.-exported firearms are already used in many crimes, attacks and human rights violations in many other nations.

There are many problems with this proposal, including it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PLEASE REJECT THIS PROPOSAL!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-qba4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2694

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Teresa Rowan

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## General Comment

I am a retired social worker, mother of three and active voter and community member. I am all too aware of the devastation that gun violence has exacted on our communities here in the US. I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-bgbr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2695

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Brock

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## General Comment

Can we please be a model for the world to look to on matters of peace and justice, beginning with our policies on gun exports:

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-el3x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2696

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martin Horwitz

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## General Comment

The State Department should continue to control firearms.

Firearms are classified as "military" for a good reason, and their regulation is much more appropriate under the State Department than the Department of Commerce.

Firearms are in need of much more regulation that they are currently, and that regulation should remain under the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-rqs5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2697

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Ayres

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## General Comment

The Commerce Department does not have the resources adequately to enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Firearm exports should continue to be regulated by the State Department. There is a compelling reason they are, and have long been, regulated by State.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-nk0a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2698

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Comfort

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## General Comment

Wage peace. Sell building technology. Use tax money for uplifting not destroying.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-11ag Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2699

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-wlps Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2700

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Black

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## General Comment

I am a parent, educator, retiree and my wife and I oppose the proposed rule for the following reasons: The proposed rule treats semi-automatic assault rifles as non-military. But many groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, DC, and several large retail chains also prohibit retail sale of semi-automatic assault rifles.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. Senators have explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. Taxpayers will absorb the cost of reviewing applications and processing licenses.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule reduces controls for gun exports. It would eliminate the State Departments Blue Lantern

program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-80ds Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2701

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-6qjx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2702

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Johnson

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## General Comment

I respectfully request that this proposed rule change be defeated. Among the reasons are that it

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7.The Commerce Department does not have the resources to enforce export controls, even now.
- 8.Reduces transparency and reporting on gun exports.
- 9.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Points 1 and 9 above are especially compelling. We definitely should not export our gun violence problems to the rest of the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-cz37 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2703

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-kbj0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2704

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charlotte Smith

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-ionu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2705

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Winterhalter

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## General Comment

I am writing to ask that you not approve the rule change that would switch the regulation of gun exports from the State Department to the Commerce Department. In this era of global tension and terrorism, it makes no sense to increase opportunities for other countries to have access to the weapons that could be used to terrorize people around the world.

Thank you for your consideration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-a4gy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2706

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michaela Tharrett

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## General Comment

This country cannot even control what is going on here with our homegrown terrorists & these guns, especially the weapons used by our military & designed for our military like the AR-15. The President appeases the gun lobby with these ideas, but that is just a fraction of the population & only serves his political purposes. We need to get our house in order. Contrary to Mr. Trump's opinion the United States does not need to be like Russia. He wouldn't even need to come up with schemes like this for trade, had he not alienated our closest allies like Canada who we had a trade deficit with, they spent more money here than we did there. I'm praying that someone who works in this government now & has control, uses common sense in this case & acts responsibly.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-cri9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2707

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alejandro Sahagun

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-h6c5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2708

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** joanne groshardt

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## General Comment

the proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-hqwu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2709

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Dixon

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## General Comment

The proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-v0xs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2710

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Dixon

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## General Comment

The proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-qhqv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2711

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Daniel West

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## General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-pv21 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2712

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paula Joyce

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-4l5b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2713

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Doug Dicharry

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This proposed transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-ulme Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2714

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Hallock

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-f8w1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2715

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dick Brown

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## General Comment

This isn't hard, it's transparent! We already allow OUR OWN gun manufacturers to distribute their wares virtually throughout our republic with hardly an eyebrow raised. Just imagine YET ANOTHER tidal wave penetrating our ports and borders! The irony here is that our President, Donald Trump, moans about how porous our borders every day of the week. Please help me here--how could this hare-brained idea have any prayer of working? No?!!! Right, I didn't thing so!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-hqjp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2716

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** J.A. Titone

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-ueej Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2717

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Melanie Steffl

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-tb9d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2718

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** terry barth

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## General Comment

I am opposed to changing the regulation of firearms from our State Dept. to our Commerce Dept. The NRA wants as many guns in as many hands as possible, they are not interested in the safety of the general public!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-7lg9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2719

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Heather Birdsong

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-2iil Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2720

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Caitlin Mears

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## General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the U.S. Commerce Department because I believe that leaving this responsibility to the U.S. State Department maintains the safety of Americans, as opposed to the best interests of corporations and their shareholders.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-q4f5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2721

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mandy Gregory

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They are killing more innocent people than ever, CHILDREN! Be humane, think of your family. Be on the right side of history, there should be subject to more controls, not less! How do you want to be remember, as a greedy selfish person who leads their innocent constituents to suffering or do you want to be remember for standing up to big corps and NRA (the devil) and taking care of your people. We all want the same thing, to be happy, safe and healthy.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-ib9h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2722

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the U.S. Commerce Department because I believe that leaving this responsibility to the U.S. State Department maintains the safety of Americans, as opposed to the best interests of corporations and their shareholders.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-qv9n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2723

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Trish Smith

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We do not need to spread violence for commercial gain!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-67de Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2724

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eileen Chieco

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world as this is how they make money. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

With the proposed rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns. Moreover, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Thus, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additionally, the rule change would make the world a more dangerous place for the following reasons: It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In summary, firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-2gur Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2725

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** NANCY HALDEN

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-t8lu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2726

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Scott Zorc

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## General Comment

I oppose the transfer of firearm export authority from the State Dept. to the Commerce Dept. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-v3h8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2727

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steven Posner

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## General Comment

The problem with indiscriminately arming nations is like the weather: If you like a current regime, wait a decade or two and it will change--often to one opposed to the United States. Accordingly, the decision whether to arm a regime is better assessed by the State Department than the Commerce Department, whose emphasis is promoting trade. The proposed rule is short-sighted and should be rejected.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-jsj4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2728

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gretchen Crook

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## General Comment

Against this transfer of authority  
Treats semi-automatic assault rifles as non-military

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-uwv0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2729

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arlene Gardner

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## General Comment

Please do not transfer firearms regulation to the Commerce Department. It more appropriately belongs to an agency promoting conflict resolution.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-r3r2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2730

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

- by eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- by removing licensing requirements for brokers, increasing the risk of trafficking.
- by removing the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please leave the regulation of firearms exports under the jurisdiction of the State Department.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-kdkz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2731

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sally Misencik

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## General Comment

Please do not let Commerce Dept in charge of weapons sales from USA.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-a3yd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2732

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jules Abate

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## General Comment

To Whom it May Concern;

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Thank you,  
Jules Abate

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-wtrb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2733

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** C.A. Incze

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## General Comment

I strongly oppose moving firearm export license oversight from the State Department to the Commerce Department. This rule change would eliminate necessary and crucial Congressional oversight for gun export deals, enable the 3D printing of firearms and allow weapons of war to more easily proliferate throughout the world. This rule change increases profits to the American gun industry while the entire world will pay the cost in lost lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-gh2s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2734

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brenda Crouser

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-l4zx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2735

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I want to make these points about the proposed rule:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-z5sc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2736

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Heavey

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## General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-83td Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2737

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia O'Neill

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I oppose switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Exports such as these belong to the State Department to handle. This is not commerce - this is exploitation by a lobbying organization to spread its influence around the world without regard to public safety. We need to reduce gun violence. Changing this regulation from the U.S. State Department to the U.S. Commerce Department effectively increases gun violence. This MUST NOT HAPPEN.C

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-ii1o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2738

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hugh Gurney

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## General Comment

I am opposed to moving the authority to regulate export of firearms from the State Department to the Commerce Department. I think the State Department is better equipped to review proposals to ship exports of firearms and is in a better position to block such exports to rogue countries where they could be used by the authorities to stifle people's right to protest against the government. We need to be very careful of whom we export dangerous firearms to and the State Department is better equipped to do that.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-wu7o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2739

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephanie Joyner

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## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-uyrg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2740

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Worth

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## General Comment

I oppose the NRA-proposed rule change to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

The State Depts mission is to safeguard our nation; the Dept of Commerces mission is to promote American business.

Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additional threatening effects of the rule change:

1. It will eliminate the State Departments Blue Lantern program, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them;
2. It will remove licensing requirements for brokers, increasing the risk of trafficking;
3. It will remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PLEASE DO NOT LET THIS RULE CHANGE TAKE EFFECT. Our national security is more important than the profits of gun manufacturers.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-h88n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2741

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Flournoy

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## General Comment

This seems like a particularly bad idea to me. These firearms are not only for the hunting enthusiast and hobbyist, but are used as weapons of conflict across the world. That would be the purview of the State Department, not the Commerce Dept. I respect the right of American citizens to own guns, but I do not want to provide the gun industry any greater latitude in their lucrative business of selling weapons around the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-axm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2742

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Gentry

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-7ab7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2743

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Hanks

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. War is not the answer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-j3ey Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2744

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pam Elders

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## General Comment

As a taxpaying, American citizen I am vehemently opposed to this proposed rule change to move the handling of export licenses of semi-automatic assault-type weapons and other powerful firearms to the US Commerce Department.

This is foolhardy and clearly not in the interests of national security. Such a move would mean Congress would not be automatically informed of the sale of large caches of firearms to foreign countries. No prudent person would think giving private arms companies the go-ahead to sell dangerous weapons overseas without proper vetting is a good idea.

Largely unregulated arms sales could endanger our national interests and security. Lack of oversight would permit arms sales to anyone, including our enemies. Furthermore, why would we want to threaten world stability and undermine our own global diplomacy as well as that of our allies?

I think that trail leads to the National Rifle Association and its lobbyists. This transfer of authority must not be approved; to do so, is to embrace an unethical and inhumane practice which will only smear our international reputation and harm our diplomatic efforts for peace. Please retain administration of export licenses with the State Department. Peace over profits.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-btua Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2745

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert and Paula Lund

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## General Comment

Please dont change the rules that are currently in place for trafficking of arms . There is no GOOD reason to change the current regulations .

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-97vw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2746

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maureen Wheeler

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## General Comment

he bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-o6t5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2747

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** N. Dumser

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-sxek Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2748

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Raeburn

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## General Comment

Dear sirs and madams: Please note that I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Public safety requires that there are continuing checks and balances on the sale of firearms.

Yours truly,

Dr. Susan Raeburn

Oakland, CA

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-z381 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2749

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** KYNA MOSER

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-qrx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2750

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Heaney

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I want to see greater controls on gun sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-mw0a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2751

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Samantha Chang

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This is a matter of national security and should be treated as such by remaining under the control of the US State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-ibm4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2752

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Drew Martin

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Extensive trafficking in firearms contributes to violence around the globe. The world is awash in firearms, particularly military style weapons. Many weapons end up in the hands of pirates, terrorists, criminals and poachers. Wildlife poaching is a major cause of loss of wildlife. We do not need to make it easier to transport firearms around the world. We should be making it more difficult.

Firearms exports are increasing the danger that people and animals face around the planet. We need to work to actively reduce the amount of firearms not make it easier to export them.

I oppose this proposal for all the following reasons as well as those I have outlined above.

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic



assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-yk0e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2753

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lee Clapp

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## General Comment

I strongly oppose moving oversight of firearm export licensing from the Department of State to the Department of Commerce.

The proposed rule change treats semiautomatic weapons as "non-military," which is absurd. Moreover, the proposed rule eliminates Congressional oversight of gun export deals, transfers the cost of processing licenses from gun manufacturers to tax payers, and enables unchecked gun production in the U.S. and exports abroad by removing the block of 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-m2ta Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2754

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Meredith Roach

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## General Comment

I am writing in response to the proposed policy to make it easier to export U.S. guns and ammunition globally and the move of export licensing from the State Department to the Commerce Department. We do not need to make it easier to export guns. There are enough in the world. The only reason for this proposed changes is to benefit the gun lobby. Here are other reasons why this should not happen:

- It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- It eliminates Congressional oversight for important gun export deals.
- It transfers the cost of processing licenses from gun manufacturers to taxpayers.
- It removes statutory license requirements for brokers, increasing risk of trafficking.
- It enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- It reduces transparency and reporting on gun exports.
- It transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

All of these reasons make this policy change ridiculous and terrifying. Please please do not allow this policy to go through. We have enough gun violence all over the world. Why create an even easier path to gun violence and human rights violations?

Thank you,  
Meredith Roach

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-c6jh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2755

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Usdan

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## General Comment

I OPPOSE the proposal. It would make America LESS SAFE. The proposal weakens controls over semiautomatic assault weapons including AR-15s and AK-47s, 50 caliber sniper rifles, and high-capacity ammunition magazines. It may also deregulate 3D printing of guns and could ultimately weaken controls on firearm imports. The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups. The proposed rules are a priority for the National Rifle Association and the National Shooting Sports Foundation (the official trade association for the firearms industry) who want to open up international markets to compensate for lagging domestic gun sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-oyqt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2756

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eve Shapiro

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## General Comment

This rule change would make the world a more dangerous place.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-x940 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2757

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kelly McCurdy

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## General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the Commerce Department. It is unnecessary and would make it easier for terrorists to acquire the firearms they desire.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-btpy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2758

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** DeSean Freeman

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## General Comment

In order to accurately and adequately account for the direct correlation between firearms possession and the violence associated with it, 'repeal' the "Dickey Amendment" barring the national Center for Disease Control and Prevention (CDC) from studying firearms violence. Seems simple, does it not?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-858z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2759

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sally Cairnes-Wurster

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The oversight is necessary for gun export deals, to make sure these firearms don't just go to the highest bidder, ie. terrorists and criminals. Plus this will have the US taxpayer on the hook for the costs of processing! It enables 3D printing of firearms as well.

No to this BS!

Sally Cairnes-Wurster



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-d5tg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2760

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nykole Sutherland

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## General Comment

The commerce department is absolutely NOT the appropriate regulatory body for deadly weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-6bql Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2761

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie Buckner

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## General Comment

I am writing to voice my strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms more dangerous by transferring controls to an agency that prioritizes business interests over national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also concerning. This rule seems designed to create profits for the U.S. gun industry. The rules description of semiautomatic assault rifles like the AR-15 as civilian products is also concerning. These weapons were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. Please do not go forward with this dangerous policy.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-299x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2762

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** matthew cazier

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-iogf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2763

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the change of regulation of the selling of firearms to other countries--it needs to stay in the state department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-tgf8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2764

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Niemi

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-5fg8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2765

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Hanauer

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Arms sales need to be carefully regulated so we do not sell weapons to terrorists and others who pose threats to our national security. The US Commerce Department does not have the resources for this and will undoubtedly favor sales over security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-tik3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2766

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** k danowski

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-b12y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2767

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Virginia Phillips

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## General Comment

I am speaking out against the proposed policy of exporting ammunition and guns globally from the United States. We have a culture of war. Providing weapons to facilitate the ease of war is not in anyone's best interest. The proposed rule changes do the following, and are of grave concern:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

This is a dangerous proposal and should be squashed immediately.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-ds7z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2768

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** K Newman

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-ga8h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2769

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chagit Steiner

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-lspe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2770

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mitchell Zito

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-ga34 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2771

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maureen O'Neal

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-2zlx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2772

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debbie Lyman

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## General Comment

I believe this rule change is dangerous and unnecessary. It would facilitate firearm exports to more easily be sent to repressive regimes and terrorist organizations. It removes safe-guards that have been in place for decades. This is a bad idea and should not happen.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945f-zizx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2773

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vicki Brown

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## General Comment

I vehemently oppose the rule change that would switch regulation of firearms export from the US State Department to the US Commerce Department. This is very, very dangerous. Firearm traffickers, organized crime, terrorist organizations among others would love to have this happen. The world is already a dangerous place. We don't have to make it worse. Just so some people can get richer. Please stop this. It doesn't make any sense at all. We're better than this.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945g-e47m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2774

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am opposed to the Trump administration proposed to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. These are the reasons that I am concerned:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually. The fact that this proposal applies to assault weapons and other powerful firearms typically used in the military is concerning in that terrorist organizations may be able to easily get their hands on these weapons. We do not need to increase the potential use of weapons whether they are here or exported abroad. Thank you for your consideration of this serious matter.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945g-587t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2775

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in support of this proposal. The current ITAR regulations, as imposed upon gunsmiths, are stifling to business. The modern gunsmith will perform tasks such as barrel replacement, muzzle threading, and other tasks that do not make him a manufacturer by the common definition of the word, but subject him to manufacturer regulations and fees. The overwhelming majority of these small businesses operate on very thin margins as a general rule anyway, and most will never export a single product outside the US. To include common sporting rifles like the Remington 700 or even the semi-automatic AR15 under this regulations is simply ludicrous and needs to be changed. Ignore the comments in opposition, not one of them knows what they are talking about, they simply oppose this common sense measure because it will benefit 2nd Amendment advocates.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945h-8klp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2776

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanna Bortz

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. The Commerce Department does not have the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945i-u5ms Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2777

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kim LeBlanc

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## General Comment

I oppose the proposed rule change because it will do the following:

- Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminate Congressional oversight for important gun export deals.
- Transfer the cost of processing licenses from gun manufacturers to taxpayers.
- Remove statutory license requirements for brokers, increasing risk of trafficking.
- Reduce or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduce transparency and reporting on gun exports.
- Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please oppose the proposed rule change. This matter was brought to my attention by Texas Gun Sense. Our country does not need reckless laws and rule changes such as these that undermine common sense gun safety. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945i-bpgm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2778

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Hamilton, LMT

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945i-pyer Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2779

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joanne Skirving

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change would eliminate necessary Congressional oversight for gun export deals, place the cost of processing licenses on U.S. taxpayers, enable 3D printing of firearms, and allow weapons of war to more easily proliferate throughout the world.

The rule change would increase profits to the American gun industry while the entire world would pay the cost in lives lost.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945j-8rt5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2780

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shoshana Katz

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## General Comment

Seems like people in the business of selling guns, want to be able to sell a lot more of them. As if we do not have too many guns all over the place. Scary.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945k-enzg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2781

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robin Johnston

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## General Comment

Please do not loosen gun export regulations. OMG. What kind of world do you want??  
Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.  
It would remove licensing requirements for brokers, increasing the risk of trafficking.  
It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945m-5tst Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2782

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Jane DelMastro

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945m-qtp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2783

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Wills

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## General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945m-29f6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2784

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** M.A. Whelan MD

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## General Comment

I believe the State Dept., should remain in control of the export of arms. Transferring this to the Commerce Dept. will emphasize only the commercial aspects, which would be a grave error!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-l7hh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2785

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A. S.

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## General Comment

Please stop the NRA backed rule and re-consider how your proposed regulations will change the face of safety in our society using the following points:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am the mother of 5 children who deserve to be safe and protected. Please stop this!  
A.S.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-9cfg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2786

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Rice

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## General Comment

Hello,

If you're being mugged and you have a gun, would you hand it over to them? President Trump's proposal to lift the current regulations exports seems to be doing the same thing. I believe the the inherently military nature of these firearms means that the sale of them is an issue of national security. I feel very strongly that the gun export laws should stay as they are. Why would we make it easier for potential terrorists or international criminals to obtain lethal weapons?

Thank you for your time.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-85nf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2787

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Skip Polson

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## General Comment

I am opposed to this rule change because:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do everything you can to stop this proposed rule change.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-ke9a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2788

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeff Egerton

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-rotk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2789

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leslie Aldridge

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## General Comment

Although I am not currently an NC resident, I am a graduate of UNC Chapel Hill and have relatives and friends who do reside in NC. I am proud to currently reside in Maryland, a state with some of the country's most stringent gun laws. Please take the opportunity to follow Maryland's example and stop legislation that will benefit gun lobbyists and endanger the lives of more American citizens.

Thank you - Lesmusic60@gmail.com

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-flfe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2790

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Brady

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## General Comment

I am a tax-paying citizen who is concerned about the consequences of this proposed rule change.

Please consider other alternatives to this proposed rule that would:

1. Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. Remove licensing requirements for brokers, increasing the risk of trafficking.
3. Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-s8tb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2791

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-gncv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2792

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Harriet Solomon

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## General Comment

The proposed changes in the rule regarding international arms regulations are RECKLESS. Lives around the world will be endangered by international and domestic criminals. It boggles the mind that an American administration can be so blind to the effect of these changes on the freedom of the traveling public to go anywhere without fear of gun violence; on the freedom of Americans to go about their business in their own country; and on the general safety of the world at large.

Please do not change these rules so drastically. They've been in place since 1940; they still work. You are hurting us, your constituents, whom you promised and swore an oath to protect against all enemies, foreign and domestic. These rule changes violate that oath on every ground.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-my14 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2793

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Napier

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## General Comment

I oppose this proposed rule for the following reasons, and for my belief that will make our world even for violent. Congress is shirking their responsibility in protecting the American people.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-yc27 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2794

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Emily Skidmore

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## General Comment

I am concerned that this proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Everything Ive heard from this administration is that they want to protect citizens from terrorists and that focus has been on immigration. Ive also heard the NRA say they fully support keeping weapons out of the hands of dangerous people but this rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-zsxn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2795

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Ortiz

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## General Comment

I strongly oppose this proposal to transfer the oversight of weapons export from the State Dept. to the Commerce Dept. The change is only for the benefit of the gun manufacturers to increase their profits and to weaken law enforcement over firearms trafficking to shady gun dealers. The security of civilian citizens here and abroad would be at risk for the following reasons.

The proposed change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-f2co Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2796

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kicab Castaneda-Mendez

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## General Comment

I adamantly oppose the proposed rule change because of its negative impact on both the domestic and international fronts.

The proposed rule would dramatically change the regulatory structure for firearm exports--in a way that makes it appears to be largely driven by the interests of industry.

It's complexity raises the concern that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. In addition, I am concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Specifically, these the rule changes that would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-zgj6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2797

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elziabeth ODear

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-84wk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2798

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lawrence Turk, RN

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## General Comment

No, dont loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule appears to be largely driven by the interests of industry.

The proposed rule does not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. Also, the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Dont eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Dont remove licensing requirements for brokers, increasing the risk of trafficking.

Dont remove the State Departments block on the 3D printing of firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-1zyb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2799

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** George Shafer

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## General Comment

This rule would make it much more dangerous for Americans traveling abroad, especially at a time when Trump has turned so much of the world against the US with his bullying



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-6k55 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2800

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Clarke-Pearson

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## General Comment

I am a North Carolina pediatrician. I am opposed to this proposed rule: International Traffic in Arms Regulations.

In a time of great national concerns about keeping our country secure, this proposed rule MAKES NO SENSE.

Specifically, it will eliminate the State Dept BLUE LANTERN program which carries out hundreds of post shipment and pre license inspections and reports these actions to the public.

Please listen to the citizens of the USA like myself and don't put us in jeopardy with this proposed rule.

Thank you.

Kathleen Clarke-Pearson MD FAAP

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-3pwg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2801

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tara Pressley

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## General Comment

I oppose the passing of this rule that would loosen regulations on weapon exports because it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. This rule should not pass.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-945p-m6ny <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2802

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Colleen Shearer

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## General Comment

I am against a Trump Administration rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-q40s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2803

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandy Irving

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## General Comment

I oppose this rule change.

This rule change would make the world far more dangerous by

Eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on th

Removing licensing requirements for brokers, increasing the risk of trafficking.

Removing the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-rfu5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2804

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Josephine Corro

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## General Comment

I am commenting on the new rule proposed by the Trump Administration that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. I am concerned that the proposed rule will not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-t4zq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2805

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** frances elsemore

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## General Comment

Questions relating to weapons should be decided with safety as a priority, not profit.  
Please do not make the world a more dangerous place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-4z8y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2806

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stefanie Mendell

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## General Comment

I oppose the Trump Administration's proposed new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I also am concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

I oppose the proposed rule because it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

I oppose the proposed rule because it would remove licensing requirements for brokers, increasing the risk of trafficking.

I oppose the proposed rule because it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-cd4j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2807

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cate Pracey

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## General Comment

I think this violates the principle of spreading non violent democracy to the world and strongly disagree with this proposal.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-5yhi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2808

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martin Washburn

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## General Comment

Deregulation of weapons sales allows the use of secondary purchases giving a path for military supplies to reach the terrorists we are trying to defeat.  
This contributes to the never-ending war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-77hg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2809

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shana Whitehead

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## General Comment

I oppose.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-71wh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2810

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please uphold rules and regulations on gun exports.  
These rules help keep people safer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-8mci Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2811

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha Roblee

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## General Comment

The Trump Administration has formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. I am concerned that the proposed rule does not adequately address our national security, international crime, or terrorist threats.

The administration should not move forward with the proposed rule, but should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-zl39 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2812

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Priscilla Crow

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## General Comment

Seriously? Why in the hell would we want to ship guns, of ANY kind, to other countries? Was that another item on Putin's "Honey Do" list for his bitch Trump?

Wait - I remember. The NRA is just another extension of the Kremlin. That's a double-debt for the GOP!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-6pfv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2813

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jane Kleba

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## General Comment

This is pure greed on display. The gun industry serves the purpose to kill. International sentiment seeks to reduce weapons of mass destruction even as the United States attempts to mass distribute guns. The quantities of guns being distributed for profit will eventually rival the same mass destruction as large weapons. This must be stopped.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-kcrq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2814

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a citizen of the USA and resident of the state of Michigan.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.



National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

More reasons exist to stop these unwise changes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-dhww Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2815

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-rryc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2816

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Walters

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-woxy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2817

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Goodkind

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## General Comment

The Trump administration has proposed changes to the agreements affecting the sale of weapons abroad that I believe would make the world a more dangerous place. Please don't value commercial gain as more important than keeping all of us safe.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not dismantle important protections that have served us well and that we still need.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-t2y9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2818

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dorothy Potter Snyder

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## General Comment

To Whom It May Concern:

It would ask that you preserve the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Eliminating these licensing requirements for brokers will increase the risk of illegal firearm trafficking.

Please also preserve the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The government's first job is to protect the people. Opening the door to the spreading of unlicensed firearms to whomever, wherever is inconsistent with the spirit of firearms laws and your obligation to protect the safety of the American people.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-c7n4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2819

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kimberlee Tellez

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-ungq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2820

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Liz Ofstad

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-9br8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2821

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Monica Ortiz

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## General Comment

My name is Monica Ortiz and I am a registered voter in Wellington, Florida. My only concern is to save lives. One life is worth more than all the guns in the world. We need to have common sense gun laws on the books. Not laws that make it easier for guns to get into the hands of someone who means to do harm to others. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. This proposed rule must not be put in place!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-1mzc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2822

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** George Phillips

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## General Comment

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-xodx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2823

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Puffett

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## General Comment

I am very OPPOSED to the proposed regulation to move the firearms exports from the State Department of Commerce.

The State Departments oversight and regulatory authority is critical to our countrys safety by monitoring weapons domestically and those coming into this country. Since most types of firearms can be used for military and terrorist activities and they should remain under the scrutiny of the Department of State for our protection rather than Department of Commerce for promoting export of our goods with little oversight.

If the regulatory rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Additionally, the Commerce Department just does not have the resources to adequately enforce export controls which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The end result is firearms will be exported to anyone with money.

For the safety of the people of our country and the world, PLEASE DO NOT approve this move.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-xe5a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2824

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Lee

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## General Comment

We know that gun violence spreads like a virus, from one person/family to another and across communities and states. Simply being close to a gun increases the chances that you will be harmed, domestic violence, suicide or accidentally. Gun violence is an epidemic in America, spreading like a wildfire in California. Please don't export this violence to other countries which would make gun violence a pandemic, like the deadly flu in 1918. It was not a disease that could be controlled. This violence will circle back through America ten-fold and may revisit it's deadly effect on you or your family.

As a physician, I stabilize patients using the ABCs first, Airway, Breathing, Circulation, the most necessary functions to keep one's body alive. Sometimes that means we don't treat the cause of their emergency first. We stabilize the airway so they can get air in, we ensure they can oxygenate effectively and then we make sure their heart is working and their blood pressure is adequate to perfuse the brain. Once we know those major organs are taken care of, we can begin to search for a cause. First, we have to buy ourselves time to work. We can continue to talk about the causes of gun violence but first we have to stop the gun deaths and stabilize the situation to give ourselves time to come up with reasonable plans. For now, stop spreading the gun violence by making more guns, transporting more guns and making it easier to get guns, even temporarily.

Ideally, if at least temporarily, HALT gun sales. There are more than enough guns on the market for people to sell to each other. Let's discuss this without all the rhetoric, without the NRA. Let's look at the science. Don't spread this epidemic. ABCs, stop the bleeding.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-299d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2825

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lydia Pyun

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## General Comment

It is appalling to hear that our gov't wants to make selling weapons easier which will help the terrorists even more. It's a well known fact our gov't has created or emboldened terrorist organizations due to lack of foresight and/or corruption.

It is ludicrous to ease sale of weapons which will empower and strengthen terrorist organizations. Trump's plan is a terrible plan and must not proceed.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-wmpr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2826

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nicholas Britten

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## General Comment

Im Nick Britten and Im for increased gun safety around the world. For that reason Im against this proposal. More specifically Im against this proposal because it does the following things:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-fjxi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2827

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alexander Hogan

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-30hk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2828

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Hartney

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## General Comment

There should be no relaxation of laws and regulations around exporting or traveling with firearms. The United States has one of the worst rates of gun violence in the world and we should not allow that to flow over into other countries. Eased exports will only support terrorist organizations. Do not enable gun manufacturers to spread their business through terrorism.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-39kd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2829

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** K. Worrell

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## General Comment

There are two major problems with this rule change moving the handling of export licenses of semiautomatic assault and other firearms from the U.S. State Department to the U.S. Commerce Department. First, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Second, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This rule change would, therefore, make it much easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous groups and organizations to obtain large caches of American guns and ammo with which to commit their horrendous crimes.

This rule change should not take place in the best interests of both American security and moral conscience.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-945r-78dq <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2830

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This would open up the sales of very dangerous weapons to other countries and i believe our security would be further degraded.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-sn71 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2831

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rhonda Johnson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-yl4v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2832

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pat Anonymous

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## General Comment

I oppose the proposed rule for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-ixb5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2833

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jacalyn Kareb

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## General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-jrdz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2834

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Conroy

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted on line instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-w3nz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2835

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ryan DeRouen

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-kaat Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2836

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Fabrizio Gabbiani

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## General Comment

I have the following concerns about the rule change. Specifically, it

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

None of these changes is beneficial to the broader public, in the US and abroad.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-3iwk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2837

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Zackery Ferguson

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## General Comment

I oppose this policy change for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals. Transfers the cost of processing licenses from gun manufacturers to taxpayers. Removes statutory license requirements for brokers, increasing risk of trafficking. Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. Reduces transparency and reporting on gun exports. Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-9dvj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2838

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer R

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-8m8c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2839

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Lindberg

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-mngi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2840

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Winn

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-kw8l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2841

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brian Smith

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## General Comment

I am concerned that the proposed export rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Please don't help make the world a more dangerous place so that weapons companies can make more money.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-fpx9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2842

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arielle Franklin

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-z892 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2843

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eugene Crook

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## General Comment

First, we should not be exporting anything to any country where it is currently against the law to own or possess such an item. This action would undermine that country's right to their own sovereign rule.  
Second, we have become the leading nation in the world in gun deaths, and we do not want to export that disease to any other country in the world.  
Third, exporting these items will create enemies and the US at this point needs friends, not new enemies.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-7t6p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2844

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Concerned American Mom

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## General Comment

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-6v0j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2845

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anna Austin

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## General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-yzot Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2846

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Reese

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## General Comment

This is stupid and only being pushed because the NRA has bought our politicians.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-1a31 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2847

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andres Quiroga

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## General Comment

Good afternoon,

My name is Andres R. Quiroga, current resident of New York. Im writing to oppose this amendment based on the overwhelming amount of evidence we have on the horrific results American weapon exports have had around the world.

If moral grounds are not enough, please remember that we have directly armed terrorist organizations in the past, which resulted in loss of life of allies and American soldiers.

I know there are other plenty factually supported reasons not to, but human life has no cost, and those 2 should suffice.

Thank you

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-rucd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2848

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

As a human rights advocate for the last decade and a half, I am writing to express my concern about, and voice my opposition to, the reclassification of semi-automatic weapons as commercial items.

Due to my extensive work on gross human rights abuses in sub-Saharan Africa, I understand the role the semi-automatic weapons play in increasing fatalities in areas of Africa affected by conflict.

For example, in the Democratic Republic of Congo, the large-scale presence of automatic and semi-automatic weapons increases the toll on civilians at the hands of armed actors inside and outside of government. According to the 2012 Amnesty International Report, "If You Resist, We Will Shoot You!" (available online at [http://www.amnesty.eu/content/assets/ATT\\_DRC\\_report.pdf](http://www.amnesty.eu/content/assets/ATT_DRC_report.pdf)), members of the Congolese Republican Guard used AK-47 rifles to disperse a crowd of pro-democracy demonstrators in the capital city of Kinshasa in late 2011.

The use of semi-automatic weapons like the AK-47 in the dispersal of protesters led to the death of 12 opposition activists as a result of this excessive force.

As such, I strenuously oppose the any federal steps to make these weapons easier to export across national borders.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-svsn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2849

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shauna Bona

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. Please note that I am a supporter of the Second Amendment and consider myself a rational moderate on the issue of guns. That being said, the proposed rule change eliminates necessary Congressional oversight for gun export, which stops an important check. I fear that we are placing the desires of the gun industry over the responsibilities of our Congressional leaders. I fear guns will proliferate and fall into the wrong hands. Mostly, I am disturbed that this action feels like it is taking place in secret, like so many changes lately, which seem to me to diminish the transparency and authority of the people to make wise, reasoned policy through their elected representatives. Please do not make this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-ev9c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2850

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Lucisano

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## General Comment

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-npu3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2851

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays in the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-320k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2852

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Daniel Ater

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## General Comment

No selling more arms of any kind outside the US!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-f5jo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2853

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jane Valentino

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-n7z5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2854

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shirley Brown

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-5be9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2855

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anon Diaz

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## General Comment

Unacceptable

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-iqgr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2856

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Victoria Pless

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## General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Other points include:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-pgtj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2857

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Crystal Colter

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-q2of Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2858

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** B. Roxanne Taylor

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## General Comment

Please block the administration's proposed rule that would loosen laws on exporting military grade weapons which could then end up in the hands of criminals & terrorists. The rule would also allow 3D printing of dangerous weapons that may not be tracked by officials. This rule is deadly & weapons could then be used against US citizens. Act now to block it.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.  
It would remove licensing requirements for brokers, increasing the risk of trafficking.  
It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-j3bt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2859

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are by design highly portable danger. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Their lethality should be subject to more controls, not fewer.

Thank you for helping to secure our country and world as a safer place.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-d5p6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2860

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ruth Harper

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-h5a6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2861

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kristina Parks

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-obcd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2862

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carolyn Bonistalli

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## General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-a75a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2863

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jill Van Vlack

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## General Comment

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-uqli Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2864

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alicia McClintock

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## General Comment

My name is Alicia McClintock and  
I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2]

Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that

firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. I hope this is taken seriously and not politicized.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-7sap Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2865

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-8190 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2866

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** michael golen

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## General Comment

Opposed to these revisions.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-g5sa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2867

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Melanie Greene

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## General Comment

As a gun-owning taxpayer, I am very concerned about this proposed change in policy. I'm especially concerned that this change eliminates Congressional oversight for important gun export deals. It reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and eliminates registration of firearms exporters, a requirement since the 1940s.

The Commerce Department does not have the resources to enforce export controls, even now. It reduces transparency and reporting on gun exports. It transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. This does not seem to be in humanity's or our country's best interests.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-ql6j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2868

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Larry Little

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please leave the regulation of firearm exports with the US State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-95id Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2869

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Bradley

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## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. International firearms sales must remain classified as "military" and therefore under regulation by the State Department, so that Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, or to countries where there are serious human rights concerns.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This would create an unacceptable proliferation of firearms in the hands of dangerous groups. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further, the rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Given the issues with gun violence and the trump Administration's attitude against immigration, this rule change would make two extremely bad situations much worse.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-s73g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2870

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alfred Sils

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## General Comment

I oppose the ill considered move of the regulations regarding the export of firearms from the Department of State to the Department of Commerce. Firearms are an instrument of foreign policy rather than a commodity. Their export regulation therefore rightly belongs at State.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-g5yj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2871

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robyn Alexander

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## General Comment

I vehemently oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

There is more than enough bloodshed and personal and community devastation in the United States from these ghastly weapons - please don't be responsible for spreading the worst of who America is to the rest of the world. Do the right thing and think of something besides profits.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-frhz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2872

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Holly Dowling

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## General Comment

I am strongly opposed to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is not in the best interests of the American public. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-2c39 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2873

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Nabors

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## General Comment

I oppose the proposal to move export licensing and oversight of assault and other powerful weapons from the Dept. of State to the Dept. of Commerce. The proposed rule would treat semiautomatic assault rifles as non-military, would eliminate congressional oversight for gun export deals, would transfer the cost of processing licenses from gun manufacturers to taxpayers, and would enable unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms.

The transfer of gun export licensing from the State Dept., which works to promote stability, conflict reduction and human rights, to the Commerce Dept., an agency with a mission to promote trade, is simply a bad idea.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-ev5m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2874

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Merica Hale

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-b8nf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2875

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gary Smith

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is too complex and driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are details on how the rule change would make the world a far more dangerous place:

- 1 It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-oivp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2876

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anna Ungaro

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## General Comment

We need peace and US should Not produce and sell arms.  
The government should ban all type of weapons,

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-hmog Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2877

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I believe that it's a mistake to change the sale of firearms to the Department of Commerce. This rule change will only come back to haunt us in a very horrible way. Just as increased firearms sales in this country haunt us. Please do not do this.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-76hr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2878

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** vera gadman

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## General Comment

Ioppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is an insane idea that Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-27gy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2879

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amanda Wilcox

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## General Comment

My 19 year old daughter was killed in a rampage shooting in 2001, so I know full well the tragic toll of gun violence. I also know that Americas gun homicide rate is more than 25 times the average of other high-income countries.

An analysis of gun homicide rates in developed countries those considered high-income by the World Bank found that the United States accounted for 46 percent of the population but 82 percent of the gun deaths.

The current proposal by the Trump administration would it easier to export U.S. guns and ammunition globally. I strongly object to America arming the world, especially with assault weapons and other powerful firearms. The proposal would move export licenses from the State Department to the Commerce Department. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually.

I object to the proliferation of weapons used in war and crime in other countries. Specifically, I oppose the proposal for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

2. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue

Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

3. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
4. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
5. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Thank you for considering my objections and concerns. I ask that this proposal be rejected.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-a7j5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2880

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Trotter

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-6ikv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2881

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dolly Howarth

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-jnus Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2882

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Ashton

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## General Comment

Semi-automatic weapons are NOT military weapons! Military units use fully-automatic (aka machine guns).

Don't listen to the morons!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-qpqz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2883

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Janet Coleman

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## General Comment

I oppose moving oversight of gun sales from the Department of State to Commerce. This could very well come back to bite (kill) us. Some things are not worth profit. Please listen up on this. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-2ui3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2884

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Moderhack

**Organization:** Self

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## General Comment

Corporate profits from the sale of guns should never take priority over sensible gun laws and protection for the world's citizens. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Do not eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Do not remove licensing requirements for brokers, which increase the risk of trafficking. And do not remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Stand up for the safety of American citizens and citizens of the world. Do not switch the regulations of firearms export from the US State Department to the US Commerce Department. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-dtj8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2885

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stacy Germano

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-qurh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2886

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pam Magidson

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## General Comment

Thank you for the opportunity to comment on the Proposed Rule: International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III.

I am a citizen and taxpayer extremely concerned about gun violence and national security, and feel strongly that the handling of export licenses of semiautomatic assault weapons and other powerful firearms should remain with the U.S. State Department rather than move to the U.S. Commerce Department, for the following reasons:

This rule would transfer gun export licensing to an agency whose principle mission is to promote trade. Both assault weapons and non-semi-automatic weapons are used in large numbers by criminals around the world. Their export should continue to be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The proposed rule would transfer the cost of processing licenses from gun manufacturers to us, the taxpayers. Registration fees that are used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So, we the taxpayers will absorb the cost of reviewing applications and processing licenses when it should remain a cost that gun exporters pay.

The rule reduces end-use controls for gun exports in several ways. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would eliminate registration of firearms exporters, which allows the State Department to check on an exporters history. Without use of this database, enforcement against arms trafficking will be seriously weakened. The Commerce Department does not compile information on human rights violations, so this rule would make it harder to deny weapons licenses to international human rights violators

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. Furthermore, Congressional oversight for important gun export deals would be eliminated. Congress will no longer be automatically informed about sizable sales of these weapons. This would violate Congressional intent and effectively eliminate Congress proper role.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

What is perhaps scariest is that the proposed rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Please do not make it easier to export U.S. guns and ammunition globally by moving export licenses of semiautomatic assault weapons and other powerful firearms, given that U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in many nations. This seems to be a rule that would only benefit gun manufacturers, and that is just plain wrong.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-wwsk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2887

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Constance Anderson

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## General Comment

I want all guns to be regulated just like cars. All have to take a mental stability test and use of firearm tests. All need to be insured and close all the loop holes at gun shows. No one should sell a gun with out a paper trail. The data base will be paid for by gun owners through their fees and this data base is live, all law enforcement and courts should see complete history from every state. No more guns in public places or schools. End open carry, no one needs to take a gun to the movies or to concerts.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-v1y2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2888

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kristopher Anonymous

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## General Comment

I think this is a terrible idea.

The proposed rule would consider semi-auto assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Civilian trade does not need need assault rifles of any sort.

This rule removes Congressional oversight for important gun export deals, reduces transparency and reporting on gun exports (which increases the risk of trafficking along with the removal of of statutory license requirements), shifts the cost of processing licenses from gun manufacturers to taxpayers, gets rid of or decreases many existing gun control efforts, encourages 3D printing of firearms, and transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

It seems practically designed to make gun trafficking more likely, harder to control, and more of a problem than it already is without expanding the resources for any agency to combat all these clear downsides.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-7dd9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2889

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jill Bailey

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## General Comment

Here are my concerns about the change to these policies:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.  
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-i76m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2890

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-wnm4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2891

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A.L. Steiner

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## General Comment

Treating semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries is unconscionable.

Do NOT:

- eliminate Congressional oversight for important gun export deals;
- transfer the cost of processing licenses from gun manufacturers to taxpayers;
- remove statutory license requirements for brokers, increasing risk of trafficking;
- reduce or eliminate end-use controls, such as State Depts Blue Lantern program, nor eliminate the registration of firearms exporters -- a requirement since the 1940s;
- enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms

As you know, the U.S. Commerce Department does not have the resources to enforce export controls, even now, so do NOT reduce transparency and reporting on gun exports. DO NOT transfer gun export licensing from an agency with mission to promote stability, conflict reduction and human rights, to an agency with mission to promote trade, for God's sake!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-yhe9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2892

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Canner

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## General Comment

Maintain control of International Traffic in Arms Regulations with the State Department where it resides currently.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

This change would make the world a far more dangerous place for these reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-9cwl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2893

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nicholas Holt

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## General Comment

Please do not allow the distribution of instructions for 3D printing of firearms. This would benefit only criminals and other dangerous individuals and groups. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-g7vs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2894

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ethan Rodriguez-Torrent

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## General Comment

Easing restrictions on the export of firearms -- including types already banned in several U.S. states -- does a disservice to the U.S. and the world. The United States is already the #1 exporter of small arms and light weapons, many of which end up in the hands of drug cartels and militias from Bogot to Jakarta. These transfers are documented in detail by wide-ranging research, including the Small Arms Survey and the U.N. Office for Disarmament Affairs. We will only be shooting ourselves in the foot (pun intended) if we choose to give gun manufacturers more freedom to contribute to instability abroad. We will also be repeating the same travesty our government has condoned for decades: putting firearm industry profits over human lives.

I urge the Department to reconsider this and any other relaxation of existing restrictions on small arms exports.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-ux4c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2895

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Richardson

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## General Comment

I am submitting this comment in support of DOS-2017-0046 to remove many items from the USML and transfer them to regulation under Export Administration Regulations. It makes sense for American industry and it makes sense to allow the Dept of State to concentrate on regulating arms that are truly military in origin and impact.

Removing gunsmiths from the purview of ITAR is a good change.

Moreover, it will remove the State Department from the regulation of ideas such as the 3D printing instructions of Defense Distributed. That horse has left the barn years ago and further regulation will never get it back.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9460-z3m7
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2896

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michelle Hanlon

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-j9p5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2897

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Bieszk

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-9yll Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2898

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joanne Gulsvig

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## General Comment

I oppose moving export license oversight for firearms from State Department to the Commerce Department. This proposed rule change eliminates necessary Congressional oversight for gun export deals, enables 3-D printing of firearms and passes on the cost of processing licenses to the US taxpayer.  
BULLSHIT

No on this stupid rule. NRA can make more money some other way.

Sincerely,

Joanne Gulsvig

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-ro78 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2899

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

After reviewing the proposed regulations under the Federal Register for the revision of Category 1, we have noticed some irregularities in the overall objective of the transition.

Industry has been told that the shift from USML to CCL would be beneficial for the following reasons.

1. No export fees
2. Less Documentation For Exports of Commercial Type products

The issues, which are not clearly addressed in the Federal Register, are listed below.

In the proposal on Page 24198, titled Revision of Category 1, the FR indicates that items, which are inherently military will continue to be controlled under the USML. One could argue that inherently military can be applicable to any modern firearm depending on the End Use of the defense article. An End User in country X for example can use a commercial product for military applications regardless of original design and manufacture of the product. What will be the determination for the split between USML and CCL for an inherently military firearm?

Secondly, is Category I(G). I(G) will continue to cover many parts for commercial firearms such as Bolt Carriers, Slides, and Sears, which can be interchangeably used by commercial and military firearms. If a commercial customer wants to order a semi-automatic rifle and parts, such as replacement bolt carrier group or a upper receiver, barrel etc., then the applicant has to file an application with Commerce and State Department. This is a huge cost on industry and major cost to Commerce and the State Department. Right now the applicant could just file one application with State Department. The proposal would force applicants to get two different sets of documentation from the Consignee and then submit two applications. The cost associated to submit an application has now doubled since manpower is required to submit two licenses, and the cost to the US Government has increased since two applications now need to be reviewed by two different organizations. What about firearms such as Glock, Sig Sauer or Beretta etc.? Who will cover the parts since the United States military has used these products in the past? Will third party aftermarket accessories be considered as inherently Military parts and require a

State Department license?

DDTC has certain threshold guidelines for case processing times. What is the current, and projected processing times for Commerce to process applications? It is not uncommon for Commerce to staff out cases back to State Department for Referral further adding to the total time for processing. There is little to benefit industry if the average processing time for a case takes longer than current DDTC performance.

In addition, presently DDTC will RWA a case with explanation if there are certain factors contained within the case that may jeopardize national security interests. This allows industry to take corrective measures. What will be the RWA measure with Commerce? One major benefit of having a case RWA with explanation is the case officer has acted as a subject matter expert to accurately decide if a defense article contains features that will not be allowed for export to a certain country or individual. This safety net limits the liability of the applicant. When a case officer can act as a secondary set of eyes, it always is in the benefit of the applicant.

In the proposal on page 24200 under Regulatory Analysis and Notices there is little to indicate if Commerce will implement fees at a later date for applications of export. Although there will be a cost savings to the State Department what will be the cost implications to Commerce? How will Commerce accommodate the influx of applications without charging a fee to hire new personnel? Specifically, on page 24201 the Department of Commerce indicates it is unable to estimate the increase in costs. How will this impact case applications and timelines?

Perhaps, State Department could adopt a sliding fee structure for organizations that do not export or export very little. Under the proposal most manufacturers will still have to register with State Department.

In summation, as the proposal stands, there is blurred lines between inherently military items, many applicants will need to file two export licenses for parts and firearms with Commerce and State, increase in processing times, liability, and potential fees later on. We support changes in making the process more efficient, more effective and giving US Companies more advantageous positions to be competitive internationally. Many companies will benefit but many companies will also be significantly disadvantaged by the proposed changes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-aakh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2900

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Lyman

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## General Comment

I am seriously concerned that any transfer of authority from the Department of State to the Commerce Department regarding the sale and shipping of any kind of firearms will bring a world of trouble to our country and to the rest of the world as well. The State Department has the resources and oversight to keep lethal weapons out of the hands of terrorists where the Commerce Department is all about supporting U S business without a keen focus on where the guns will go and what will they be used for. Our world is already awash in guns of all types and we don't need less oversight - we need much more. I would demand that the State Dept. should be given further powers to monitor overseas firearm sales. Commerce should be concerned with non lethal products and commodities and supporting our businesses who trade in products other than firearms.  
NO to the transfer of authority from State to Commerce regarding fire arms sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-bfd9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2901

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Samuel Haller

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## General Comment

My friend and fellow citizen said it best:

"Easing restrictions on the export of firearms -- including types already banned in several U.S. states -- does a disservice to the U.S. and the world. The United States is already the #1 exporter of small arms and light weapons, many of which end up in the hands of drug cartels and militias from Bogot to Jakarta. These transfers are documented in detail by wide-ranging research, including the Small Arms Survey and the U.N. Office for Disarmament Affairs. We will only be shooting ourselves in the foot (pun intended) if we choose to give gun manufacturers more freedom to contribute to instability abroad. We will also be repeating the same travesty our government has condoned for decades: putting firearm industry profits over human lives.

I urge the Department to reconsider this and any other relaxation of existing restrictions on small arms exports."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-jcyl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2902

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** mary ellen masciale

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## General Comment

I do not support the changes to the rules for International Traffic in Arms Regulations.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-tocp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2903

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann Armstrong

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## General Comment

Comments Re: Proposal for the United States to move oversight of export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department

I am a female senior citizen who, over a span of 76 years, has seen the sale and use of fire arms, especially assault-style weapons designed for military use, proliferate and the loss of life due to gun violence increase to a sickening and almost unimaginable level.

I vehemently oppose the proposal to move oversight of such weapons semi-automatic assault weapons, sniper rifles, and other powerful firearms not meant for use in hunting or other gun-related recreational sport, nor ever meant for self-defense from the State Department to the Commerce Department. Such weapons of war rightfully and logically belong under the purview of a military-oriented department. Further, removal of such weapons from the domain of the State Department is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. If this proposal is allowed to be enacted, Congress will no longer be automatically informed about sizable sales of these weapons, weakening controls on who ends up with such weapons even lifting restrictions on 3D printing of guns and inevitably leading to people making their own how powered weapons.

This proposal is really a sop to the gun industry and the NRA, aiding them in opening international markets and exporting U.S. guns and ammunition globally without regulation, and will likely lead to more U.S. guns ending up in the hands of criminal organizations, human rights abusers, and terrorist groups. It is a cynical move that wholly ignores the needs and rights of American citizens to live free of the fear of gun violence. It will take the country backward in the fight to reduce gun violence rather than move us forward in our efforts to promote and secure the safety of our citizens.

Further, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. The gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and



light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will also reduce transparency and reporting on gun exports. It would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

It is high time we stop kowtowing to the NRA and the gun lobby and start protecting our citizens rights to live free of fear of gun violence. I urge you in the strongest possible way to reject this proposal.

Ann H. Armstrong  
Forest Park, Illinois 60130

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-83jg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2904

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Philip Koster

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-6bam Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2905

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Megan Kilb

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-yy5m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2906

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christina Lachance

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## General Comment

Exporting weapons of war helps no one and causes unnecessary loss of human life. This practice must cease.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-my01 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2907

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Klauke

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## General Comment

I am opposed to this proposed rule change. Instead, the Administration should consider other alternatives to better balance the important interests at stake.

Specifically:

I am opposed to the elimination of the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

I am opposed to the removal of licensing requirements for brokers because it will increase the risk of trafficking.

I am opposed to the removal of the State Departments block on the 3D printing of firearms. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-ehrf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2908

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jill Blumenthal

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## General Comment

I am concerned about the proposed changes. While I want our Second Amendment rights protected, I am also concerned that dangerous weapons don't get into the hands of the wrong people, which threatens public safety.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-jvm2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2909

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brian Pomerantz

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-r5mn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2910

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Russell Hartmann

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## General Comment

Hello, my name is Russell Hartmann. I am very concerned about gun violence in the world. Please do not make U.S. gun exports easier. I do not like that the administration is proposing to make it so transparency and reporting on gun exports. This whole rule is terrible. Please do not use it.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-1opx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2911

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann Peterson

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-9ox5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2912

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erin Anonymous

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## General Comment

I live in Oregon and have advocated for gun laws enforcing safety requirements for the sake of those who want to live in a peaceful society. I disagree and disapprove of the transfer of licensing fees from gun manufacturers and I disapprove of guns leaving this country capable of being weapons of war and going to other countries where they could harm civilians. We are a country which still struggles to treat women as equal to men, and whose violent crimes are largely committed by men, possibly due to a prevailing worldview where men are the center of that world view. And so it is illogical to me to hear people declare this country the greatest country in the world and then permit weapons of war to leave our country and go to other countries where the oppression of women or minority groups might be even worse or more unpredictable. We have a moral obligation to not let destructive weapons leave our control as a country because we have not yet reached equality nor perfection in social behavior or control, and even if we say we have no morals to account ourselves to we still have the inescapable desire to call ourselves the greatest nation on earth. And that would be a lie if we did not protect others from the very failings, or worse, we ourselves have. Transferring fees from businesses who make a tool of death is only putting in 'bronze' the pervasive man centered world view as if it is here to stay and will never be lifted up from up off of the people. If the companies want to make a tool of death let them pay the associated costs. They should not be allowed to use other people to bear their responsibilities.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-nqco Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2913

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-rwjz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2914

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sally Martinelli

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-cd6n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2915

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pauline Higgins

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This rule change transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-bau7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2916

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christopher Lish

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## General Comment

Sunday, July 8, 2018

Subject: Do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department -- International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III (Docket ID: DOS-2017-0046-0001)

To: Secretary of State Mike Pompeo, Secretary of Commerce Wilbur Ross, Under Secretary of Commerce for Industry and Security Eric L. Hirschhorn, and Assistant Secretary for Export Administration Richard E. Ashooh,

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you are aware, firearms exports are currently classified as "military and are under the jurisdiction of the State Department. Congress can also block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines, Saudi Arabia, and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have sufficient staff, let alone staff in every nation around the world. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would also make the world a far more dangerous place because:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.

3) It would remove the State Departments block on the 3-D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3-D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3-D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3-D printing of firearms in the U.S. and around the globe.

I strongly urge you to reject this proposed rule change.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-6b7x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2917

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Johanna McConnell

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## General Comment

I am strongly against letting US gun manufacturers sell weapons abroad. Those guns will be purchased by criminal gangs and used against law enforcement and US soldiers. Selling US guns abroad is being promoted by Trump so the NRA and gun manufacturers will support Trump and give him money to support his campaign in 2020.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-geue Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2918

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Watts

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-1yqn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2919

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Meggin Lane

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake. I would like our legacy, as the United States of America, to be that we made the world a safer place to live rather than create an increase in the level of violence in which the world is already dealing.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-n9io Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2920

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tracy Feldman

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## General Comment

I am a parent and educator in Durham, NC. I am strongly against the new rule being considered about deregulating gun exports. This would make our world more dangerous in many ways:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-lwbd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2921

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Coyle

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## General Comment

I believe the changes proposed would make gun trade too open and unregulated, endangering not only U.S. Citizens but countries receiving more guns as a result.

Sincerely,  
John B. Coyle, M.S. Ed

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-hy0a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2922

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lynn Gravelle

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## General Comment

I oppose the rules change that would move the handling of export licenses of powerful firearms from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the experience and resources to adequately enforce export control. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-26k6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2923

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carita Weaver

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## General Comment

I am against this because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-agln Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2924

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Branch

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## General Comment

I am completely opposed to the proposed rule change. This proposed rule change seems extremely ill conceived. We have so many problems with guns in our country. Why do we want to make things more difficult for the US and the world in relationship to arms?

It will do the following if passed:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-otxw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2925

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Olinger

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## General Comment

I am writing to express my vehement opposition to moving export license oversight for firearms from the U.S. Department of State to the U.S. Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is clearly inconsistent with the undeniable reality that our troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

Our government should not be making it easier to trade/export weapons that are likely to be used in other countries by organized crime, terrorism, human rights violations, and political violence. It is inappropriate and shameful that the proposal would, in effect, use the Commerce Department to promote trade in such weapons to kill human beings abroad. Abroad, our country already has the reputation as being overrun with guns; so our solution is to make it easier to export these weapons? The current gun export licensing oversight under the State Department is appropriate as that agency's mission is promoting stability, conflict reduction, and human rights.

In addition to reducing transparency and reporting on gun exports, the proposed rule also would: eliminate Congressional oversight for important gun export deals; transfer the cost of processing licenses from gun manufacturers to taxpayers; and, enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Shameful.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-g53x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2926

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Lenkowski

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

The last thing we need to export is America's love of guns and the devastating slaughter that results from that love affair!

Leave firearms export license oversight in the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-rd7v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2927

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Janiece Staton Ret. RN, MSW, MAT

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-wpkm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2928

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Coffee

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## General Comment

This proposed rule is irresponsible because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-jqvs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2929

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shirley Rombough

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## General Comment

I oppose the regulation that would remove the exporting of firearms from the U.S. State Department to the Department of Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-lnrm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2930

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Lusch

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## General Comment

I'm against making it easier to export firearms to other countries. In most cases they will be used to do bad things. Why support something like this? The arms manufactureres just want to make more money.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-oprc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2931

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Melissa Henriksen

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-196u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2932

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Bellm

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-o528 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2933

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cara Artman

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-toej Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2934

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kelly Alba

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## General Comment

Please consider the following negative aspects:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-rfls Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2935

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margret Harburg

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-d5ns Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2936

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

It should be illegal to import or export firearms from other countries.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-6hlx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2937

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Enid Cardinal

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please take all this into consideration before you would take the extremely dangerous step.

Thank you.

Enid Cardinal

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-w16d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2938

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am not in agreement with the proposed changes to the International Traffic in Arms Regulations. Intending to revise these three categories indicates a commercial pursuit not considering the deadly impact it could have on recipient countries. Widening this market with a more diverse selection will spur more international trade with international armies and polices infamously recognized for their human right repression.

I fear this will allow the United States Department of State to give clearance to gun shops across the South West to offer a wider selection for our governments and armies south of the border. I fear for that for the pursuit of commercial growth, unworthy and untrusting armed forces across the world will have access to this deregulating market.

The Federal Register of Munitions should be more mindful of who their customer base is, on an international level, and spend more time investigating the international trafficking of arms. It is no coincidence that Border Patrol Agent Brian Terry was killed with a gun supposedly monitored by the ATF's Fast and Furious Operation.

I understand the economic concerns some gun shop owners and employees and the industry as a whole may have, but the potential for US-manufactured, commercially-approved, gun-fueled violence in the world should not be overlooked due to the loss of some revenue.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-gnz1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2939

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah McArthur

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## General Comment

I am a concerned citizen who worries that easing the export of arms internationally will facilitate the weapons ending up in the hands of terrorists. Haven't we been down this road before with the Iran-Contra scandal?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-io9b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2940

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gabriel C

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## General Comment

As an entrepreneur and skilled maker who is capable of creating performance parts and custom sporting firearms for use in shooting competitions, I am unable to enter this market without significant financial backing. I cannot create a hammer, trigger sear, disconnector, any part. I cannot tune and improve handguns and sell them as signature upgraded firearms. Not unless I register with the DDTC, and stay registered with them annually at a great expense for a one-man show.

I support the elimination of the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control. I believe this imposed requirement was done to choke innovation and advancement in the firearms industry.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-2gp7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2941

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Cardinet

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## General Comment

Do not make it easier to export firearms or ammunition.

Make the rules stricter and harder. We do not need to export these weapons and ammunition.

In the long run firearm exportation only make the world amore dangerous place

Paul Cardinet



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-ncqs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2942

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** D. Foster

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Semiautomatic assault weapons and other powerful firearms are clearly military and as such must continue to be under the regulation of the State Department and to allow Congress the ability to block sales of large batches of firearms to foreign countries in the name of national security, and to countries where there are serious human rights concerns. The Commerce Department just does not have the resources to adequately enforce export controls; firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The rule change would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe, which is a terrible idea. This rule change would make both the US and the world a far more dangerous place.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-lp8s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2943

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Caroline Todd

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military and therefore are under the regulation of the State Department, and thus Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Come on -- it is obvious our national security is implicated. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world as this is how they make money. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-mm2t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2944

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-nao6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2945

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hannah Berg

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## General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the U.S. Commerce Department because I believe that leaving this responsibility to the U.S. State Department maintains the safety of Americans, as opposed to the best interests of corporations and their shareholders.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-hd4p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2946

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robb Fisher

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military and therefore are under the regulation of the State Department, and thus Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Come on -- it is obvious our national security is implicated. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world as this is how they make money. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-mesz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2947

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Simpson

**Organization:** Retired

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## General Comment

This proposal would inevitably lead to many more deaths, suffering and subjugation of innocent citizens. Please do not endorse this proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9465-ae66 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2948

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Josh Silverstein

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Sincerely,  
Josh Silverstein  
Brooklyn, NY

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9465-ejua Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2949

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patti Gorman

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## General Comment

I oppose the regulation change that would put firearms under the Department of Commerce instead of the Department of Defense. The ramifications are very serious and dangerous.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9466-9s51 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2950

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Knutson

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## General Comment

Please retain overview and potential restrictions on international gun sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9466-6ae2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2951

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lama R

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## General Comment

I oppose this rule change. I believe the US State Department should continue to have control over foreign arms sales. This could otherwise become dangerous especially if weapons get into the wrong hands. Gun sales to foreign entities should remain as military sales that are carefully controlled by the US State Department. Otherwise, this could become a major security risk for our nation. The US Commerce Department is focused on promoting American business. This is not about American business. This is about American safety. The US State Department is focused on safeguarding our nation. It is the right entity to continue having control over foreign arms sales.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9466-ldl9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2952

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gary Simmons

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## General Comment

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

I oppose the proposed rule.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9467-dsw1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2953

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mariela Acevedo

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9468-c2ri Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2954

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andrew Walcher

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## General Comment

I am writing to oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Firearms are a weapon of war and tight restrictions should be maintained on which foreign entities can have access to these.

The current rules automatically informing Congress about sizable weapons sales is critical to keep military-grade hardware from falling into the hands of regimes which pose serious human rights concerns towards their people, or those which would pass these weapons along to terrorist organizations.

The Commerce Department does not have the resources to adequately enforce export controls as its Bureau of Industry and Security does not have staff everywhere. This means we will be relying on the same industry self-regulation which has produced the disastrous US domestic firearms policy. In short, profit will be placed over national security.

While not perfect, the State Departments Blue Lantern program is a much better alternative to this giveaway to the gun industry.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9469-vj3z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2955

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Blackley

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## General Comment

Why make gun sales easier to potential terrorists?

Are three D guns easier to slip onto airplanes?

Why loosen regulations on guns shipments and sale?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9469-cxwh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2956

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Smith

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## General Comment

The Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946a-damm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2957

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Freeland

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946a-2gg0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2958

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carolyn Belczyk

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946a-n1mc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2959

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Zitzmann

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946b-sih8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2960

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946b-l510 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2961

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** richard kunkel

**Organization:** nobody

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## General Comment

I am against this legislation, as it will just make more guns more accessible. Not common sense, not common, not even sense.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946b-i4zj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2962

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Janice Valder

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## General Comment

Please do not pass this in my name. When we the taxpayers are having to pay 4 decreased regulation of semi-automatic weapons and guns it is making me responsible for how they are used to kill each other and to kill us. We are already killing our own with weapons made and sold by our gun manufacturers. I ask you in the Department of State to become peacemakers not war makers.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946c-xy29 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2963

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debra Chisholm

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## General Comment

Dear Sir/Madam:

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Sincerely,  
Debra Chisholm

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946c-5077 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2964

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha Hill

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## General Comment

I am a retired person concerned about the cost shift that will happen with these changes. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946c-bws2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2965

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Victoria Chance

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## General Comment

My name is Victoria Chance from Greenville, SC. I oppose this proposed rule. As a Franciscan and a citizen, we should not export semi-automatic weapons. These firearms should be dismantled and recycled. Congress needs to maintain oversight over ALL guns sales. Exporters should pay for licenses. We should never remove the block on printing 3-D firearms.

We are all responsible for the safety of one another. Passing this proposed rule would simply jeopardize the rest the world as we export our propensity for violence for the sake of money. Profit is not a justification for increasing the violence in the world. Our government should be exporting humanitarian aid, education, and our justice system NOT weapons.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-78n3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2966

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Cooper

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## General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. I am afraid of the use of assault rifles by non-military troops such as guerillas.

Eliminates Congressional oversight for important gun export deals. Congressional oversight is essential.

Transfers the cost of processing licenses from gun manufacturers to taxpayers. We taxpayers do not want to pay the cost of processing gun licenses.

Removes statutory license requirements for brokers, increasing risk of trafficking. This point suggests a complete lack of control over who will ultimately receive and use the weapons we transport. This is very dangerous.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade. This is a very good point. Guns are weapons of war and killing and should be used only as necessary in order to promote peace.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-738l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2967

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura M

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## General Comment

I am a teacher within the Chicago Public Schools district. I am opposed to amending the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

The firearms industry is hurting financially - revising these rules to benefit the fire arms industry's bottom line is NOT in the best interest of Americans or any global citizens.

We do not need more guns in the hands of those that wish to cause us harm. These high powered weapons belong in the hands of our military and not civilians.

Also, the amendments proposed would limit Congressional oversight on important gun export deals and drastically increases the possibility for gun trafficking. This is unacceptable.

I respectfully ask that the Department of State does not amend the International Traffic in Arms Regulations (ITAR).

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-imzp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2968

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tucker Respass

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department vigorously oppose the rule changes that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Such trade must be factored into international interactions and diplomacy. It is not simply a matter of commerce. Further, the proposals to cease licensing would make arms too easily trafficked, especially without at least as much inspection as has been conducted with State Department oversight. And there should never be 3D reproduction of guns of any size of fire-power.

Tucker Respass

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-qgxs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2969

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-n52u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2970

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephen Johnson

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## General Comment

Please stop these sales of weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-58xc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2971

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela Albers

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## General Comment

I am a 60 year old American citizen who is sickened by the unnecessary violence perpetuated by the availability of weapons.

I am opposed to the proposed rule change for the following reasons:

The proposed rule change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

The proposed rules are bad policy and encourage bad conduct.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-5x6b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2972

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Renee Fitzpatrick

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-9n9r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2973

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mikaela Morocco-Schelp

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## General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Furthermore, it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-v2sa Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2974

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** JL Angell

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## General Comment

I oppose the proposed rule as explained in the attached.

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## Attachments

I oppose the proposed rule for the following reasons

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey [2] <<http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government - i.e., taxpayers - will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention [3] <<http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>>
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S.

Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. [4] <<http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency - the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. [5]

<http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35e1d658f42>> The export of these weapons should be subject to more controls, not less.

[1] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35e1d658f42>> International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III [DOS\_FRDOC\_0001-4527, Docket No. Docket DOS-2017-0046] and Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) [83 FR 24166, Docket No. 111227796-5786-01].

[2] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35e1d658f42>> “US lawmakers balk at arms sales to Saudi Arabia, Turkey and Nigeria,” *DefenseNews*, Sept. 26, 2017, <https://www.defensenews.com/congress/2017/09/26/us-lawmakers-balk-at-arms-sales-to-saudi-arabia-turkey-and-nigeria/>

[3] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35e1d658f42>> “Arms Dealer Faces New Charges,” *New York Times*, Aug. 23, 2010, <https://www.nytimes.com/2010/08/24/us/24arms.html>

[4] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35e1d658f42>> Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf>

[5] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35e1d658f42>> Ongoing resource on “Cross Border Gun Trafficking: An Ongoing Analysis of the Types of Firearms Illegally Trafficked from the United States to Mexico and Other Latin American and Caribbean Countries as Revealed in U.S. Court Documents,” by the Violence Policy Center, <http://www.vpc.org/indicted/>

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-wbd4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2975

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Mitkus

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## General Comment

I OPPOSE this rule change. The proposed rule would dramatically change the regulatory structure for firearm exports. Further, the proposed rule is being driven by the interests of the gun industry.

I am concerned that the proposed rule will not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

The rule change would make the world a far more dangerous place in the following ways:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Rather than moving forward with the proposed rule, the Administration should SCRAP this rule and consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-396k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2976

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Victoria Ross

**Organization:** WNY Peace Center

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## General Comment

This would be a terrible scourge on the world, with the only beneficiaries the Merchants of Death - I mean arms manufacturers. The United States cannot, must not allow this avenue that can flood the world with military-grade arms. If you have any conscience at all, please do not allow this to happen. The many lives that would be lost would be on your head. Please do the responsible thing and block this proposal!! Our communities our nation and our world will thank you for it



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946e-2n2p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2977

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Douglas Bohling

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946e-8wlm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2978

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** karyn barry

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## General Comment

The US should not be trafficking in weapons. We have fueled too much bloodshed, suffering and wars around the Globe. How about exporting peace?!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946e-te0x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2979

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Walls

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## General Comment

To whom it may concern:

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports to Commerce would facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and exacerbates the worldwide refugee crisis.

William J. Walls

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-lvuk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2980

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Barrineau

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## General Comment

The proposed gun rule change would benefit the NRA while making the world a far more dangerous place for the rest of us.

By eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; removing licensing requirements for brokers, increasing the risk of trafficking; and removing the State Departments block on the 3D printing of firearms.

Please protect us. Protect the rest of the world, too. Thank you. I vote!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-q7fv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2981

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Noella Poinsette

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## General Comment

We should not be exporting more guns especially guns of the same type that our military uses and the licensing should not be transferred to an agency the Commerce Department that already cannot fulfill its responsibilities. Licensing needs to stay with the State Department which is more focused on the harm that these weapons do to our citizens abroad and citizens of other countries.

A 2nd reason I am strongly opposed to these proposed changes is that congressional oversight would effectively be eliminated. This is extremely important because without such oversight nobody would have been aware of the scope of recent human rights violations in the Philippines or in Turkey.

We as a country need to continue to stand up for the dignity of each person - a dignity that is far more important than a few people or companies making money off of an increase in violence and killing.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-609q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2982

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katharine Tussing

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## General Comment

Please do not transfer the regulation of firearms export from the Department of State to the Department of Commerce. That would facilitate even more warfare around the world and firearm exports to oppressive regimes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-wugm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2983

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Theresa Turner

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Theresa Turner  
Spring Lake, NJ

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-49zh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2984

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Colleen Scanlon

**Organization:** Catholic Health Initiatives

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## General Comment

See attached letter.

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## Attachments

CHI\_Overseas gun sales\_final



**Catholic Health  
Initiatives**

*Imagine better health.™*

198 Inverness Drive West  
Englewood, CO 80112

P 303.298.9100  
catholichealthinitiatives.org

*Submitted via regulations.gov*

July 9, 2018

Wilbur Ross  
Secretary  
Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Room 2099B  
1401 Constitution Avenue NW  
Washington, DC 20230

Mike Pompeo  
Secretary  
Office of Defense Trade Controls Policy  
Directorate of Defense Trade Controls  
U.S. Department of State  
2201 C Street NW  
Washington, D.C. 20520

**RE: RIN 0694-AF47 (Commerce) and RIN 1400-AE30 (State)**

Dear Mr. Ross and Mr. Pompeo,

Catholic Health Initiatives appreciates the opportunity to comment on the proposed rules to address the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). Catholic Health Initiatives (CHI) is a faith-based nonprofit health system operating in 18 states with 100 hospitals and numerous other services and facilities that span the inpatient and outpatient continuum of care. As a Catholic organization, we feel a special call to reduce violence in our communities and around the world.

While these proposed rule touches many aspects of firearm regulation, sales and oversight, CHI is particularly concerned about the transfer of weapon sale regulation from the State Department to the Commerce Department and the negative effect this may have on violence around the world. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Catholic Health Initiatives

July 9, 2018

Rather, the rule proposes to transfer gun export licensing to the Commerce Department, whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The types of weapons being transferred to Commerce Department control—including the AR-15, AK-47, and other military-style assault rifles and their ammunition—are among the deadliest personal-use weapons produced in the United States. We also understand they are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

**We should not export American violence solely to boost economic development, competitive advantage, or other commerce-related goals. We strongly urge the Departments of Commerce and State to rescind this proposed rule.**

Thank you for consideration of our comments on this important issue. If you have any questions, please contact me at 303-298-9100 or contact Laura Krausa, Director of Advocacy, at [laurakrausa@catholichealth.net](mailto:laurakrausa@catholichealth.net).

Sincerely,

A handwritten signature in cursive script, appearing to read "Colleen Scanlon".

Colleen Scanlon, RN, JD  
Senior Vice President and Chief Advocacy Officer



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-6k66 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2985

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The US arms makers are a major source of small arms originally designed for and supplied to our military. Since 1970 or so they have hit the civilian market in vast numbers, and we are seeing the totally expected abuse with mass shootings in the US. Really, do we want more of the same with these same guns in the hands of foreign gangsters, despotic governments, terrorists, etc.,etc? The NRA's only concern is to sell as many guns as possible, not only here, but across the world. Isn't there anyone in our government. who has the courage to push back on this insanity? Please do. Peter eyonmark

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-v4kk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2986

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bill Durston

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## General Comment

Americans Against Gun Violence opposes the transfer of oversight for regulation of firearms exports from the State Department to the Commerce Department, as proposed by the Trump Administration in the ITAR amendment, categories I, II, and III. The new proposed changes would have numerous adverse effects, including, but not limited to, the following:

Reclassifies semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime,

political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

The ITAR amendments proposed by the Trump Administration are clearly an effort to boost lagging domestic gun sales without regard to the safety of civilians in other countries. The epidemic of gun violence in the United States is a national disgrace. We should not be in the business of exporting this epidemic abroad.

Yours truly,

Bill Durston, MD

President, Americans Against Gun Violence  
(916) 668-4160 / (888) 286-8122

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-j7ng Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2987

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandy Commons

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## General Comment

I am opposed to the transfer of firearms regulation from the State Department to the Commerce Department. It would open far too many opportunities for terrorists to get their hands on weapons we produce so as to use them against us.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-2iao Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2988

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kellyanne Bondulich

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-zl02 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2989

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Schneegurt

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## General Comment

I am a registered Republican from Kansas and I always vote. I stand with the students from Parkland and want to limit gun violence with common sense laws and regulations. Let's not follow the bad practices of Ollie North (the criminal) head of NRA.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military.

The proposed rule would eliminate Congressional oversight for important gun export deals.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons.

The rule reduces end-use controls for gun exports.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.

The proposed change will reduce transparency and reporting on gun exports.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-4plm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2990

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Larson

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-i2ai Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2991

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Are you kidding me? Will shameless greed at the expense of the lives of God's children never end under Republican rule? How much is enough? Make money but honor God's children. What if you were at the receiving end of these weapons' aim? "What profit a man if he gain the world but lose his soul?". I pray your hearts and minds be opened to truth. I pray for your well being.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-j92p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2992

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** E Smith

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-xsq2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2993

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hollye Dexter

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## General Comment

My name is Hollye Dexter. I am on the board of directors for Women Against Gun Violence and have experienced the scourge of gun violence in my own family. I vehemently oppose the transfer of oversight of firearms export from the state to commerce department. Guns kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less. Incidentally, did anyone consider that arming criminals and terrorists in third world countries will only send more asylum seekers fleeing to our borders?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-hbd0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2994

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alice Dahle

**Organization:** Amnesty International USA

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## General Comment

For thirty-five years I have been a member of Amnesty International USA and currently chair our Women's Human Rights Coordination Group. Amnesty International is the world's largest grassroots human rights organization, and our global movement consists of millions of members and activists who defend justice, dignity and freedom for everyone without exception. The Women's Human Rights Coordination Group's particular area of interest is in the human rights of women and girls.

We are concerned about recent proposals to move responsibility for oversight of licensing of international sales of some small arms and light weapons from the Department of State to the Department of Commerce and the removal from the US Munitions List (USML) of several semi-automatic firearms, including AR-15s, some AK-47s and high capacity ammunition cartridges. Since 2014, the U.S. has been one of the worlds largest arms dealers, and is responsible for approximately 30 percent of conventional arms transfers with regards to monetary value. Consequently, these changes would make sales of these weapons easier and expand access to them at their destination. They would also reduce accountability for their use in commission of human rights abuses.

It is now recognized that rape and sexual assault are systematically used as weapons of war in conflicts around the world. Attacks on women and girls terrorize families, communities or ethnic groups, humiliating and demoralizing local residents to bring them under control, or causing them to flee from disputed territory

In interviews with women and girls who have survived sexual violence during conflict, a very high number of their stories include descriptions of the torture they endured at the point of a gun. Although the particular models of firearms involved are seldom identified, there is no doubt that a military-style weapon contributed to gross violations of their human rights. Even after a conflict has officially ended, the weapons left behind are used all too often by perpetrators of domestic violence. Colombia receives a large proportion of their weapons from the U.S. These guns are often linked to the patriarchal culture that supports the notion that firearms help men to defend themselves and protect their families. However, these weapons exacerbate violence against women and girls. In Colombia, 2 out of 10 women who are

internally displaced identify sexual violence as the primary cause. The exact model of firearm used in violence against women and girls is irrelevant, and all military-style weapons and ammunition currently on the US Munitions List should remain there.

Amnesty International was actively involved for two decades in negotiating the global Arms Trade Treaty (ATT), which went into force in December 2014. This treaty requires that before authorizing a transnational sale of firearms, governments must assess the risk that the weapons under consideration would be used to commit or facilitate serious violations of international humanitarian or human rights law, undermine peace and security, or to engage in transnational organized crime. An "overriding" risk that the arms would be used for these purposes would prohibit the sale.

After intense lobbying by women's human rights organizations and activists during the drafting of the ATT, it became the first treaty that recognized the link between the international arms trade and gender-based violence. Article 7(4) of the treaty made it mandatory for arms exporting countries to assess the risk that weapons being considered for sale would be used to commit or facilitate gender-based violence and deny authorization in the case of an "overriding" risk.

Moving responsibility for authorizing international sales of additional weapons and ammunition from the Department of State to the Department of Commerce would bypass the requirement to assess the risk that the merchandise in question would be used to commit or facilitate human rights violations, including gender-based violence. It is essential that these standards continue to be upheld, and we strongly urge the Government to maintain responsibility for international sales of weapons and ammunition manufactured in the US with the Department of State.

Sincerely,

Alice Dahle, Chair  
Women's Human Rights Coordination Group  
Amnesty International USA

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-ilg4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2995

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Iannucci

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## General Comment

I am writing to express my opposition to the proposed rule regarding the regulation of international arms traffic. The rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-gknn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2996

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tammy Kreznar

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-2jx2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2997

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lynda Stewart

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-53bv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2998

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karole Friemann

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Please review this legislation and guarantee that it does not allow guns to be sold to terrorists in other countries or those who will use them against the United States and its citizens. It is time to run this country in the best interest of our citizens and the citizens of the world!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-eong Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-2999

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** stephen canner

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## General Comment

keep it with state department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-o3qo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3000

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Hall

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## General Comment

I oppose the regulation of firearms exports by the Department of Commerce rather than the Department of State. The former department is already overburdened while State has the resources to continue this job. America must not become the gun dealer to the world and make worse the proliferation of weapons, especially weapons that will find their way back to our streets.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-vtec Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3001

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margo Chesley

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-w5qi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3002

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Al Lindsey, M.D.

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## General Comment

Please do not allow the supervision of Firearms Exporters to be transferred from State to Commerce. This is bad policy on too many fronts to include, and it is another gift to the gun lobby, which has received too many gifts from this failed and illegitimate administration already.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-u859 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3003

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sreevalli Chivukula

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-ppvj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3004

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kate Kizer

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## General Comment

I'm an expert on civilian harm and the arms trade, and I write to urge you to reject this dangerous proposal because:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, and US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate arms exports.
2. The proposed rule would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, which will limit its ability to comment on related human rights concerns. Items moved to Commerce control would no longer be subject to the statutory required congressional notification for sales of firearms regulated by the US Munitions List valued at \$1 million or more. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing, leaving the government i.e. taxpayers to absorb the cost of reviewing applications and processing licenses.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

5. The rule reduces end-use controls for gun exports. It would eliminate the States Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. End-use controls also are weakened by eliminating registration of firearms exporters. Registration of exporters allows State to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transferring licensing to Commerce will remove new exporters and brokers of these firearms from State's database, weakening enforcement.

6. The rule enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the US and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, State has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance the Commerce does not.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-tc52 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3005

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William M. Musser IV

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-o6ts Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3006

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christy Milam

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## General Comment

I oppose the the Trump administration proposal to move the make it easier to export U.S. guns and ammunition globally. By transferring the authority from the State Department to the Commerce Department, the number of exports applicant will increase by 10,000 annually. This includes assault weapons and other powerful firearms! This change in policy is problematic because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.  
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-fafh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3007

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jacob Gurvis

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-rb8h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3008

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Yamada

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I urge rejecting this change. The United States shouldnt be exporting death weapons without careful deliberations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-55ft Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3009

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nicole Clarke

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## General Comment

I oppose the proposed rule, as it loosens the regulation of gun exports and increases the risk that military-style weapons land in the hands of international criminals. The proposed rule dramatically changes the regulatory structure for firearm exports and appears largely driven by the interests of the firearms industry. Notably, the proposed rule decreases transparency to Congress and the public. I urge you to reject the proposed rule as currently drafted.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-v7qq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3010

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Willliam Marsh

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## General Comment

I am opposed to the transfer of oversight of firearms exports from the State Department to the Commerce Department. Firearms are weapons of war. The State Department is tasked with relations with other countries and the reduction of violent conflict in the world. On the other hand the Commerce Department would be responsible for increasing the sale of such weapons in support of US arms manufacturers. The Commerce Department has no responsibility to determine the effect of a particular arms sale on the stability of a country or region.

The State Department is in a position to know the political ramifications of shipping weapons of war to any particular country or region, and therefore should be in charge regulating the sale of such weapons of war. The sale of such weapons should remain under control of the United States Munitions List (USML) .

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-bdd8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3011

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amanda Smock

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## General Comment

Right now, firearms exports are classified as military. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. The Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-5ta2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3012

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so that public may understand the impact of these rules and potential firearm exports. Also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-wy44 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3013

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Daniale Lynch

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

When will the safety of our children and the members of our communities become more important than the profits of the gun industry?



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-lj5w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3014

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-85bb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3015

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ben Musser

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-eqto Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3016

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephen Berkwitz

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## General Comment

Regrettably, on May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of the gun industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms, which could lead to great bloodshed in other countries. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-hi13 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3017

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephen Lane

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## General Comment

I oppose this, or any other, rule change that would move the regulations of firearms export from the State Department to any other agency. That change would encourage firearms sales to entities that we all agree should not have them, such as oppressive political regimes, criminals and terrorists in other countries. The resulting increase in violence would not only destabilize those countries, but encourage mass migration to the United States, both undesirable outcomes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-x22l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3018

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Kelcey

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## General Comment

I am in opposition to this rule change. Congress needs to control arms sales through the state department not the business department. Weapons or arms sales should be controlled in the interests of the entire country not just a businesses need to improvethebottom line.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-p8ce Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3019

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lori Van Orden

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

brokers of these weapons to register and obtain a license, increasing the risk of trafficking. [3]

The rule would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4]. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-13b7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3020

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-958y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3021

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kamella Tate

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## General Comment

I come from many generations of responsible rural gun owners. There are times and places where gun ownership and use are critical; however, I find the proposal to ease restrictions on the exportation of guns and ammunition from the United States to be abhorrent. We struggle enough with gun violence in our own country, that the gun industry and the NRA are pushing to embed that struggle in other communities just to increase sales and profits is poisonous and amounts to nothing more than greed run amuck. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-3kaq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3022

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dennis Gormley

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-afut Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3023

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Fishback

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## General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-3bsg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3024

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sherry Blanton

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## General Comment

Please do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are not just merchandise made and sold to profit businesses; they are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-fy6p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3025

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maureen Brennan

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## General Comment

I work for a company that makes military life support equipment (helmets, masks). These items are protected under ITAR / EAR regulations - so that they don't fall into the wrong hands. How can we consider GUNS (any!) to be non-military items and not controlled by ITAR? The proposed rules would eliminate Congressional oversight for important gun export deals - Congress would not longer be automatically informed about sizable sales of these weapons. On top of that, the new rules would make taxpayers pay for "licenses" via the Commerce Department- not the manufacturers via the State Department. And depending on the size of the sale- this is a lot of money. In summary: the proposed change will reduce transparency and reporting on gun exports - Congress and the public will not be aware of the total dollar value of firearms sales and where they are delivered.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-u1f8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3026

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marilyn Silvey

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## General Comment

I support keeping arms sales under the control of the Department of State and not moving them to the Department of Commerce. We need the strictest controls possible.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-rauw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3027

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** S Nuckols

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-z085 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3028

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Roodhuyzen

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-uxnj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3029

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cyndie Anonymous

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## General Comment

I oppose a rule change that would switch the regulations of firearms export from the State Department to the Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-3gi3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3030

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Morgan Miles

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## General Comment

Hello, I am writing to express my concern for this proposal. It is inappropriate to make it easier for US guns and assault rifles even easier for other countries to get, especially since many of our guns are already used by "bad guys" across the globe. This treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries which is not ok. This eliminates Congressional oversight for important gun export deals which makes it easier to hide where the guns are going. This transfers the cost of processing licenses from gun manufacturers to taxpayers. This removes statutory license requirements for brokers, increasing risk of trafficking. This proposal reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Additionally this proposal is a bad idea because:

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please do not allow this policy to go into effect.

Morgan Miles, LBSW

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-4mia Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3031

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-8xca Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3032

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** TERRY KOSOBUD

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## General Comment

I oppose this change in rules. Control of guns should remain within the US Department of State. The US government should not be in the business of trying to promote gun sales abroad. There is enough evidence that easy access to guns results in innocent people being killed.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-io6x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3033

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Byrd

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-f0ax Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3034

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Reddy

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-xgjr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3035

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Axtell

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-6ac2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3036

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Danielle Machotka

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not institute this change.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-xz8z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3037

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Campbell

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## General Comment

I oppose this rule change that would switch the handling of firearms regulations from U.S. State Dept to U.S. Commerce Dept. I oppose the U.S. making money around the world while creating unrest and killings when there are already too many . More guns means more killing. Enough is enough!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-2fw6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3038

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Lindsay-Poland

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## General Comment

Comment on Proposed Rules on Categories i-ii-iii by Depts. of State and Commerce  
John Lindsay-Poland, Global Exchange

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. Please see the attached version for complete comment, sources, and notes.

The State Department proposed rule states that those weapons that would stay on the USML are inherently for military end use, adding that the items to be removed from the USML do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad. One State Department official reportedly said: We kind of refer to it as the Walmart rule. If its like something you can buy at a Walmart, why should we have control?

The Commerce Departments description of criteria for items to be moved off of the USML concludes: Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items. (p. 4) It adds that: There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities. However, the examples given here are not from prospective importing nations, but from the United States: Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their parts, components, accessories and attachments.

Retail availability in the U.S. should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively different from nearly every market in the world: with 4.4% of the worlds population, the U.S. comprises more than 45% of the worlds firearms in civilian possession.

In addition, the statement neglects another significant portion of the worldwide market for firearms: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm. In the vast majority countries, there is a presumption against civilians owning firearms unless certain conditions and requirements are met. (S. Parker, Small Arms Survey, 2011)

Many nations either do not permit or highly restrict civilian use of some or all types of semi-automatic firearms and high-capacity magazines proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms. Within the United States, semi-automatic rifles and high-capacity magazines are prohibited for retail sale in six states and the District of Columbia. Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries.

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. Many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming.

States impose limitations on the retail availability, types of firearms that may be legally purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons. The potential and actual negative consequences of the ill use of such firearms are devastating. A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

The proposed rules do not articulate any requirement for a review by State Department experts on human rights and criminal organizations. If that is the proposers intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

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## Attachments

GlobalExchange comment 9july2018

**Comment on Proposed Rules on Categories i-ii-iii by Depts. of State and Commerce**  
 John Lindsay-Poland, Global Exchange

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. This comment focuses on the proposed criterion of wide retail availability for firearms and munitions proposed for transfer from the USML to the Commerce Department, and includes brief comments about inter-agency review and about risks of criminal use.

The State Department proposed rule states that those weapons that would stay on the USML “are inherently for military end use,” adding that the items to be removed from the USML “do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad.” (p. 5) One State Department official was quoted in a press report about the proposed rule: “We kind of refer to it as the Walmart rule. If it’s like something you can buy at a Walmart, why should we have control?”<sup>1</sup>

The Commerce Department’s description of criteria for items to be moved off of the USML concludes: “Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items.” (p. 4) It adds that: “There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities.” (pp. 6-7) However, the examples given here are not from prospective importing nations, but from the United States:

“Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their ‘parts,’ ‘components,’ ‘accessories’ and ‘attachments.’” (p. 7)

The retail availability in the United States should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively different from nearly every market in the world: the United States, with 4.4% of the world’s population,<sup>2</sup> comprises more than 45% of the world’s firearms in civilian possession.<sup>3</sup>

In addition, the statement neglects another significant portion of the “worldwide market for firearms”: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, the retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm.<sup>4</sup> In China, firearm purchases are banned for most people, and private gun ownership is almost unheard of.<sup>5</sup> In the vast majority countries, according to one of the few studies of firearms regulations, “there is a presumption against civilians owning

firearms unless certain conditions and requirements are met.”<sup>6</sup>

Belize, Colombia, Israel, Japan, Kenya, Turkey, and United Kingdom do not permit any civilian use of some or all types of semi-automatic firearms proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms.<sup>7</sup> Other nations, including Australia, Canada, Croatia, India, Lithuania, New Zealand, South Africa, Switzerland apply special restrictions to civilian possession of semi-automatic firearms, such as proof that they are needed for self-defense, and so it cannot be said that these firearms are “widely available in retail outlets” there. We emphasize that these examples are from only a selected sample of 28 countries; a full accounting of countries where there is only limited or any retail availability of semi-automatic firearms would certainly show many more.<sup>8</sup> Brazil also prohibits “assault weapons” for civilian purchase, while Chile and Colombia prohibit civilian possession of semi-automatic weapons entirely.<sup>9</sup>

Moreover, within the United States, semi-automatic rifles and high-capacity magazines such as those proposed to be removed from the USML are prohibited for retail sale in six states and the District of Columbia.

Magazines with a capacity of more than 10 rounds are not permitted for civilians in Australia.<sup>10</sup> Brazil, France, Romania, Slovenia, Spain, and Turkey do not permit purchase by ordinary civilians of high-capacity magazines.<sup>11</sup> DDTC policy has reportedly excluded export of high-capacity magazines except to military and law enforcement end users,<sup>12</sup> but nothing in the proposed rule indicates that the Department of Commerce would enact such a policy.

Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries. In the Dominican Republic, for example, “certain firearms are considered ‘war weapons’ and can only be used by government forces, including .45 calibre pistols [and] rifles,” according a Small Arms Survey study,<sup>13</sup> while Spain prohibits civilian purchase of firearms with a caliber of 20 mm or higher, which are considered to be “designed for war use.”<sup>14</sup> More types – in some cases all types - of handguns are prohibited for civilian purchase in Belize, Canada, Colombia, Japan, Kazakhstan, the Russian Federation, the United Kingdom, and Venezuela.<sup>15</sup>

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. In addition to prohibitions or restrictions on retail availability of types of firearms, many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming. In India, for example, obtaining a license to acquire a firearm requires the applicant to demonstrate training in use of a gun, and often takes years.<sup>16</sup> Japan requires gun buyers to go through 12 processes before purchasing any type of firearm.<sup>17</sup>

States impose limitations on the retail availability, types of firearms that may be legally



purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons, and of private security companies. The potential and actual negative consequences of the ill use of such firearms are devastating.<sup>18</sup> A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

Processes for gun exports reflect substantive priorities and as such are integral to policy. The National Sports Shooting Foundation (NSSF) claims that under the proposed rule, “Applications would go through the same interagency review process, including by the Defense Department and the State Department’s human rights and other experts.”<sup>19</sup> However, the proposed rules do not articulate any requirement for such a review by State Department experts on human rights and criminal organizations. If that is the proposers’ intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

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<sup>1</sup> David Sherfinski, “Trump officials to roll back rules on some gun exports,” *The Washington Times*, May 1, 2018, <https://m.washingtontimes.com/news/2018/may/1/trump-officials-to-roll-back-rules-on-some-gun-exp/>. It should also be noted that Walmart does not operate in more than 100 nations (see: <https://corporate.walmart.com/our-story/our-locations>) and that in the United States Walmart does not sell semi-automatic assault rifles, high capacity magazines, or even (except in Alaska) handguns. See: <https://news.walmart.com/2018/02/28/walmart-statement-on-firearms-policy>.

<sup>2</sup> <https://www.census.gov/popclock/>

<sup>3</sup> Aaron Karp, *Estimating Global Civilian-Held Firearms Numbers*, Small Arms Survey, June 2018, at: <http://www.smallarmssurvey.org/fileadmin/docs/T-Briefing-Papers/SAS-BP-Civilian-Firearms-Numbers.pdf>

<sup>4</sup> Kate Linthicum, “There is only one gun store in all of Mexico. So why is gun violence soaring?” *The Los Angeles Times*, May 24, 2018, <https://www.latimes.com/world/la-fg-mexico-guns-20180524-story.html>.

<sup>5</sup> Ben Blanchard, “Difficult to buy a gun in China, but not explosives,” Reuters, October 2, 2015, at: <https://www.reuters.com/article/uk-china-security-idUSKCN0RV5QV20151002>.

<sup>6</sup> Sarah Parker, “Balancing Act: Regulation of Civilian Firearm Possession,” chapter 9 in *States of Security: Small Arms Survey 2011*, Small Arms Survey, Geneva, p. 6, at: <http://www.smallarmssurvey.org/fileadmin/docs/A-Yearbook/2011/en/Small-Arms-Survey-2011-Chapter-09-EN.pdf>.

<sup>7</sup> Parker, pp. 9-13; Law Library of Congress, *Firearms-Control Legislation and Policy*, 2013, at: <http://www.loc.gov/law/help/firearms-control/firearms-control.pdf>.

<sup>8</sup> Parker, pp. 2, 9-13.

<sup>9</sup> Lisandra Paraguassu, Ricardo Brito, “U.S. biggest source of illegal foreign guns in Brazil – report,” *Reuters*, January 10, 2018, <https://af.reuters.com/article/worldNews/idAFKBN1EZ2M3>.

David Gacs, Rachel Glickhouse, and Carin Zissis, “Gun Laws in Latin America’s Six Largest Economies,” Americas Society, January 11, 2013, <https://www.as-coa.org/articles/explainer-gun-laws-latin-americas-six-largest-economies>.

<sup>10</sup> Law Library of Congress, p. 20.

<sup>11</sup> “Overview of gun laws by nation,” at: [https://en.wikipedia.org/wiki/Overview\\_of\\_gun\\_laws\\_by\\_nation](https://en.wikipedia.org/wiki/Overview_of_gun_laws_by_nation). France: <https://www.service-public.fr/particuliers/vosdroits/F2242>. Romania: <http://www.gandul.info/reportaj/exclusiv-20-000-de-romani-s-au-inarmat-in-2011-fostul-sef-de-la-arme-din-politie-stii-cat-e-valabil-avizul-psihologic-pana-iesi-pe-usa-cabinetului-9375494>.

<sup>12</sup> Clif Burns, “High Capacity Magazines Exported from U.S. to Norway Shooter,” *ExportLaw Blog*, July 28, 2011, at: <https://www.exportlawblog.com/archives/3315>.

<sup>13</sup> Parker, p. 8.

<sup>14</sup> Law Library of Congress, p. 219.

<sup>15</sup> Parker, pp. 9-13; Gaes, Glickhouse and Zissis.

<sup>16</sup> Rama Lakshmi, “India already had some of the world’s strictest gun laws. Now it’s tightened them,” *Washington Post*, August 1, 2016, [https://www.washingtonpost.com/world/asia\\_pacific/india-had-the-one-of-the-strictest-gun-laws-in-the-world-it-just-got-tighter/2016/08/01/afid9422-51da-11e6-b652-315ae5d4d4dd\\_story.html?utm\\_term=.f69ad52bfff](https://www.washingtonpost.com/world/asia_pacific/india-had-the-one-of-the-strictest-gun-laws-in-the-world-it-just-got-tighter/2016/08/01/afid9422-51da-11e6-b652-315ae5d4d4dd_story.html?utm_term=.f69ad52bfff).

<sup>17</sup> 1. Take a firearm class and pass a written exam, which is held up to three times a year. 2. Get a doctor’s note saying you are mentally fit and do not have a history of drug abuse. 3. Apply for a permit to take firing training, which may take up to a month. 4. Describe in a police interview why you need a gun. 5. Pass a review of your criminal history, gun possession record, employment, involvement with organized crime groups, personal debt and relationships with friends, family and neighbors. 6. Apply for a gunpowder permit. 7. Take a one-day training class and pass a firing test. 8. Obtain a certificate from a gun dealer describing the gun you want. 9. If you want a gun for hunting, apply for a hunting license. 10. Buy a gun safe and an ammunition locker that meet safety regulations. 11. Allow the police to inspect your gun storage. 12. Pass an additional background review. Audrey Carlsen and Sahil Chinoy, “How to Buy a Gun in 15 Countries,” *The New York Times*, March 2, 2018, <https://www.nytimes.com/interactive/2018/03/02/world/international-gun-laws.html>.

<sup>18</sup> Brazil provides an important example. See Rogert Muggah, “Where do Rio de Janeiro’s crime guns come from?” *openDemocracy*, August 8, 2016, <https://www.opendemocracy.net/democraciaabierta/robert-muggah/where-do-rio-de-janeiros-crime-guns-come-from>.

<sup>19</sup> Larry Keane, “Why export control reform makes security and business sense,” National Shooting Sports Foundation, July 6 2018, <https://www.nssf.org/why-export-control-reform-makes-security-and-business-sense/>.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-o6bg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3039

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am a U.S. taxpayer, resident, and citizen by birth. I oppose the transfer of oversight of firearms export from the State Department to the Commerce Department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not fewer. Thank you.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-sow7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3040

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dawn Sticklen

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-x3fu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3041

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cathie McGeehan

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## General Comment

Please do not loosen the gun regulations!

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-y9ek Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3042

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Waltz

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## General Comment

My comments are attached

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## Attachments

Comment\_on\_regs\_6-30-18

30 June 2018

To: DDTCPublicComments@state.gov  
Office of Defense Trade Controls Policy, Department of State  
and  
Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of  
Commerce, Room 2099B, 14<sup>th</sup> Street and Pennsylvania Avenue NW, Washington DC  
20230

Subject: ITAR Amendment - Categories I, II, and III  
EAR Amendment - RIN 0694-AF47

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I am writing to submit comments on the proposed changes to ITAR (USML) and EAR (CCL) recently published in the Federal Register. I write in a personal capacity but the views expressed are informed by my research, policy analysis, and teaching as a professor at the University of Michigan, Gerald R. Ford School of Public Policy.

By way of a few introductory remarks, I am familiar with the complexities of US arms export laws and policy, as well as the regulatory framework. There is a legitimate need for periodic updates of the USML and—in view of the labyrinth of entangled laws, regulations, and agencies involved in the current system—I am supportive of the reform initiative. I am generally more concerned about keeping weapons out of the hands of those who would misuse them than in making them easier to procure, but that end is not at odds with the objective of putting in place a single control list and a single administrative agency. The reform effort has not progressed to that point, however, and I am wary about these proposed regulatory changes as an interim step. I will also add that I have been following the export control reform project since it was announced in 2009 and this is the only time I have felt the need to express concerns about the proposed changes. That is largely due to the particular, complete and recognizable, weapons that are being considered for change.

**1. I urge you to delay the effective date of the proposed changes until the Government Accounting Office or the Library of Congress has publicly reported to the Congress their impact on numerous statutes referring to “defense articles.”**

If enacted, the changes would have implications for several provisions of law. From my reading of both sets of proposed regulations, I am not reassured that the implications have been fully considered. The USML is formally defined in the AECA (22 USC 2778) as a definitive list of defense articles,<sup>1</sup> and from a quick search of US statutes the term “defense article” appears in some 45 sections,<sup>2</sup> in many instances (but

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<sup>1</sup> 22 USC 2778(a)(1).

<sup>2</sup> Office of the Law Revision Counsel, United States Code, <http://www.uscode.house.gov>.

not always) explicitly linked to the USML. In addition, several provisions of the AECA itself are explicitly linked to an item's presence on the USML (without necessarily referring to "defense articles"). On a separate statutory track, the Foreign Assistance Act was recently amended to include CCL 600 series items as defense articles, along with all items contained on the USML [22 USC 2304.(d)(2)(C)], but the legislation did not anticipate the new 500 series so there is likely a gap there with regards to Congressional intentions. To complicate things further, the US Munitions Import List (USMIL) makes liberal use of the term "defense article," defined as articles on the USMIL—which currently include the same items that are slated to lose the "defense article" designation that extends from inclusion on the USML — so that items designated as defense articles on the USMIL will not be considered defense articles for purposes of export.<sup>3</sup>

It is very challenging to sort out the tangle. Some of the instances where terms and definitions are at variance may not prove significant, but others may have far-reaching implications. Due to the disparate definitions and linkages, the proposal to remove specified firearms from the USML raises some important questions about the continuing applicability of provisions of law that refer to "defense articles," a term that currently encompasses such firearms. In numerous situations the current statutory treatment of non-automatic firearms would be altered — or at least become ambiguous—as a result simply of moving these weapons from Category I of the USML to the 500-series on CCL. Statutory provisions that could be affected by the proposed change range from Export-Import Bank financing of defense article sales to human rights conditionality on security assistance, to the provisions for third-party transfer of grant-supplied defense articles, and various reports to Congress. (See references in the footnote below.<sup>4</sup>) In some cases, the law in question is not directly linked to arms exports, but the relevant statute refers to defense articles and links the definition to items on the USML. In this way, removing specified firearms from the USML is likely to have a host of unintended and unanticipated repercussions.

Further, if semi-automatic weapons and other non-automatic firearms are removed from the USML it will impact the ability of law enforcement to charge weapons traffickers with violating the AECA as was done in several of the cases cited in a recent report from the Department of Justice on export enforcement.<sup>5</sup>

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<sup>3</sup> 27 CFR 447.11 and 27 CFR 447.21.

<sup>4</sup> The numerous places where the meaning of "defense article" would be called into question by the proposed rules include:

- Export-Import Bank financing of defense article sales, including multiple end use considerations and other conditions (12 USC 635);
- Requirement to give Congress notice of commercial firearms sales of \$1,000,000 or more (22 USC 2776)
- Annual report to Congress on military assistance, and specifically on transfers of USML Category I firearms (22 USC 2415)
- Provisions for supplying defense articles on a grant-basis, and multiple restrictions (22 USC 2314)
- Conditions for third-party transfer of defense articles provided on a grant basis (22 USC 2314)
- Certification of end use as a condition of sale or lease of defense article (22 USC 2753)
- Post-delivery verification of credible reports of misuse of weapons (22 USC 2753)
- Brokers of items included on the USML are required to register and activity must be licensed; exporters of USML items must identify all consignees and freight forwarders in license application (22 USC 2778)

<sup>5</sup> Department of Justice, "Summary Of Major U.S. Export Enforcement, Economic Espionage, And Sanctions-Related Criminal Cases," January 2018, <https://www.justice.gov/nsd/page/file/1044446/download> .

As Acting Assistant Secretary for Political-Military Affairs Tina Kaidanow explained to the House Foreign Affairs Committee last June,<sup>6</sup> the US arms export architecture is very complex and involves what her predecessors have described as “cradle to grave” oversight of exported US *defense articles*. Removing that designation *defense article* from weapons that are not fully automatic has the effect of detaching them from the US Munitions List and the regulatory framework built around it: there may well be significant unintended consequences.

In the event that consideration of the proposals is not delayed, I would recommend several other changes to the proposed ITAR and EAR revisions.

**2. Retain existing USML I(a) and (d) unchanged; retain the existing coverage of USML II(a) unchanged; delete proposed 0A501.a and .b; and limit proposed 0A502 to renumbering existing 0A984.**

My concern here is based on principle and definition. Several of the weapons that would be moved to CCL are military-style weapons that are either used in battlefield situations or are substantially comparable to weapons as used in battlefield situations – including semi-automatic assault rifles and bolt-action sniper rifles. All of USML I(a), I(d), and II(a) are currently designated “significant military equipment” due to “their capacity for substantial military utility or capability,” per the ITAR definition.<sup>7</sup> The prevalence of armed extremists and insurgents who depend on weapons currently included in USML Categories I and II makes the military utility or capability of these weapons as relevant as ever. Due to their size and long shelf life, firearms are easily diverted and resold on black markets around the world. The Department of Justice’s January 2018 summary of major US export enforcement cases noted above includes recent smuggling of semi-automatic assault rifles (and other firearms) to Dominican Republic, the Gambia, Russia via Latvia, Thailand and other destinations. In addition, the report documents the case of two men in Georgia attempting to export firearms to a range of international on the dark net, and another similar case from Kansas.<sup>8</sup>

While the US military may not derive great advantage from most of these weapons, they still have the military utility and capability of threatening the lives and welfare of many people around the world. It is in the interest of the US and American citizens to keep the tightest control on them. Indeed, it is for that very reason that the same weapons being proposed for removal from the US Munitions List are expected to remain on the US Munitions *Import* List, where their entry into the US will remain tightly controlled. It is also for that reason that a growing number of states are imposing limitations on the retail availability of these weapons and many retailers are voluntarily removing them from their shelves. They should remain where they are, on the USML.

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<sup>6</sup> “Foreign Military Sales: Process and Policy,” testimony from Tina S. Kaidanow, Acting Assistant Secretary, Bureau of Political-Military Affairs, Statement Before the Subcommittee on Terrorism, Nonproliferation and Trade, House Foreign Affairs Committee, June 2017. <https://www.state.gov/t/pm/rls/rm/2017/271928.htm>.

<sup>7</sup> 22 CFR 120.7 at <https://www.gpo.gov/fdsys/pkg/CFR-2004-title22-vol1/pdf/CFR-2004-title22-vol1-sec120-7.pdf>.

<sup>8</sup> Department of Justice, op. cit..



3. Before proposed regulatory changes are adopted, an opinion should be obtained from the Department of Justice concerning the legality of applying ITAR brokering restrictions to exports of firearms transferred from the USML to the CCL. Furthermore, Congress and the public should be informed as to how the proposed arrangements will address the risk of diversion.

There are several reasons to be concerned about the proposed rules pertaining to brokering. From their origin in the 1930s, a major intent of efforts to regulate arms exports has been to curtail illicit and undesirable trafficking in weapons. In the 1980s and 1990s, illicit flows of small arms flooded international markets, with calamitous effects in every region of the world. The rate of flow may have slowed since the 1990s, but as the 2018 Justice Department report attests, the efforts to supply contraband firearms are very much alive in our own time. From a global perspective, brokering laws are considered a weak link in the regulatory apparatus, to the extent that in the 1990s there was some talk of negotiating an international treaty focused entirely on arms brokering. Provisions written into US law around that time were considered some of the strongest in the world. With the transfer of specified semi-automatic and non-automatic weapons to CCL, the brokering laws would no longer be applied to these weapons (or would be applied only in a much-weakened version) and they would not be available to law enforcement for prosecution purposes.

**My specific concerns with the proposal to apply existing AECA/ITAR brokering rules to items intended for transfer to the CCL are twofold, related to the dubious statutory underpinnings of the proposed rule change and to its practical implications.**

(a) The first concern is a matter of statutory coherence and proper statutory authority. The brokering clauses of the AECA require commercial brokers involved in the transfer of defense articles to register with the State Department and apply for their transactions to be licensed (22 USC 2778).<sup>9</sup> The AECA brokering provisions are explicitly linked to defense articles on the USML (and by implication, ITAR). Because the proposed changes to ITAR and CCL would remove specified non-automatic and semi-automatic firearms from the USML, on the face of it, it would seem that commercial brokers of these items would be released from ITAR registration and brokering requirements. To prevent this outcome, the State Department proposes a patch, by asserting that the AECA brokering provisions will also apply to the US Munitions *Import* List (which, as noted above, will continue to include the items that—for export purpose—are deemed no longer to warrant control under the USML). The intended effect is that brokers wanting to *export* items included on the list of items controlled as defense articles for *import* (but not for export) will be subject to the rules pertaining to the export of such items. The logic is convoluted at best, and it raises questions about the statutory grounding for requiring brokers who are exporting items “no longer warranting control under USML” to register with the State Department and comply with related ITAR requirements. Given the complexity of the issue and the risks associated with brokering activities, it would seem advisable and prudent to seek a legal opinion within the Executive Branch to ensure that the provisions of the AECA pertaining to brokers—including the registration requirement-- can be applied

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<sup>9</sup> Per 22 USC 2778 (b)(1)(A)(i), “...every person (other than an officer or employee of the United States Government acting in official capacity) who engages in the business of brokering activities with respect to the manufacture, export, import, or transfer of any defense article or defense service designated by the President under subsection (a)(1), or in the business of brokering activities with respect to the manufacture, export, import, or transfer of any foreign defense article or defense service (as defined in subclause (IV)), shall register with the United States Government agency charged with the administration of this section, and shall pay a registration fee which shall be prescribed by such regulations.

robustly to all involved in the wide range of brokering activities associated with the *export* of items on the US Munitions Import List.<sup>10</sup> Such a legal opinion should be obtained and considered before the regulatory changes are adopted.

(b) The second issue about brokering rules relates to the practical effects of the numerous proposed changes to ITAR section 129. It is hard to imagine, in the first place, the steps by which the licensing of a transaction will be handled by Commerce and any brokering aspects (including completion of information required by 22 CFR 129.6) will be handled by State. It boggles the mind to consider how this might actually amount to a time-saving simplification of rules. I am primarily concerned about the proposed amendment 129.2(b)(2)(vii), however, which appears to negate the controls on brokering for transactions subject to EAR and open a significant loophole for unscrupulous brokers. If I have understood the proposed changes to Section 129.2 correctly, if a Michigan-based retail sports outlet licensed to sell firearms in the US wanted to sell, say, AR-15 semi-automatic rifles to clients in another country, then so long as the Michigan retailer could secure approval via the BIS licensing process, the various parties involved in shipment, financing, and possibly transshipment would be exempt from any registration and approval requirements. Nor would they necessarily be known to licensing and enforcement agents based in the Commerce Department. What in this scenario would deter an unknown and independent handler from diverting the weapons to unauthorized end-users? I would like to assume that government officials in the State and Commerce Departments have thought through the implications of the proposed rules as they might be bent for nefarious purpose as well as their service for industry cost and convenience, but the published rules do not provide assurance in that regard. **More clarification is needed about how the brokering regulations will be applied, how the inter-agency process will be managed, and the extent to which the proposed arrangements for registering and licensing brokers involved in acquiring, financing and transporting exported firearms will address the risk of diversion to non-authorized end-users.** One effect of transferring non-automatic firearms from the USML to the CCL is to remove them from the remit of the State Department's Blue Lantern program, which otherwise might be engaged to make post-shipment checks. It is not clear whether Commerce has a comparable program or what resources it will assign to monitoring the commerce in semi-automatic firearms.

#### 4. Amend proposals for EAR Section 734.

BIS has indicated that items moving "to the CCL would be subject to existing EAR concepts of jurisdiction and controls related to 'development' and 'production,' as well operation, installation, and maintenance 'technology.'" This approach would appear to give rise to the possibility of widespread and openly sanctioned circulation of open source, non-proprietary instructions for using computer-aided design (CAD) files to produce via 3D-printing technology, or text files to produce via CNC milling the firearms removed from USML. Until now, this development has been blocked in the courts via application of ITAR provisions requiring export license. **Either the Department of Commerce should clarify that it views any software instructions for producing controlled firearms already to be within the ambit of the EAR, or EAR Section 734.7 should be amended to bring circulation of open-source, non-proprietary CAD and other electronic files under EAR control - possibly by establishing that electronic files for producing functional firearms are subject to EAR control as production technology.**

<sup>10</sup> When questions arose in 1996 as to the authority of the President to restrict munitions imports under the AECA, the Office of Legal Counsel in the Justice Department was asked to provide an opinion. A similar request for opinion is warranted here. See [https://www.justice.gov/sites/default/files/olc/opinions/1996/02/31/op-olc-v020-p0049\\_0.pdf](https://www.justice.gov/sites/default/files/olc/opinions/1996/02/31/op-olc-v020-p0049_0.pdf).



**5. Amend provisions for License Control – Crime Control**

Shotguns controlled under 0A502 are subject to the Crime Control because they are not controlled by Wassenaar. It is not evident, however, why items 0A501a are controlled for Regional Security but not Crime Control, as firearms are a main element of crime control equipment used by police and security forces. Moreover, federal statutes explicitly prohibit the export of crime control equipment to police and security forces in countries whose governments have a consistent pattern of gross violations of internationally recognized human rights, with exceptions requiring Presidential certification. **To bring the proposed regulations into alignment with provisions of the Foreign Assistance Act [22 USC 2304(a)(2), which makes explicit reference to crime control equipment under the aegis of the (expired) Export Administration Act], items in 0A501A should be subject to Crime Control.**

**6. Include information from enhanced reporting on certain firearms exports in annual 655 Report.**

Enhanced reporting of items in the 501 series is potentially one bright spot in the proposed regulations. Several proposed changes are welcome, including: proposed changes in EAR part 748 requiring information about required import licenses; proposed changes in reporting mandated in EAR part 758; the required use of EEI filing for 0A501.a firearms; and the proposed recordkeeping requirement in part 762.

If the proposed rules are ultimately accepted, the information provided to the Wassenaar Arrangement and the UN Register of Conventional Arms will provide more granular information about US commercial exports of firearms, which seemingly could be included without significant additional effort in the annual 655 report mandated by the Foreign Assistance Act, 22 USC 2415.

**7. The balance of costs and benefits significantly favors industry over the taxpayer.**

The two sets of proposed rules include calculations of expected costs and benefits of the changes. Having invested several hours parsing the proposed rules, I suspect that one major benefit of the changes will accrue to the attorneys who help clients wend their way through federal regulations. The registration system as it was initially set up was intended to pay for itself, via modest registration and licensing fees that covered the costs of recording and updating information on US arms manufacturers and reviewing details for proposed transactions. In some sense, it has been a fee-for-service arrangement. The proposed changes significantly alter that approach with regards to firearms proposed for transfer to the CCL.

Except for the presumably few brokers unable to qualify for the firearms registration exemption outlined in proposed changes to ITAR section 129.2, no registration or license fees will be collected. Some of the transactions may be straightforward, but the workload promises to be substantial, with 4000-10,000 applications and virtually every 0A501 transaction subject to at least regional security controls, with no license exceptions available. **Whereas under the current system fees paid by industry and brokers help offset the costs of processing the license applications, under the proposed system the expenses associated with reviewing license applications will be charged to the taxpayer.** In the current political environment where government hiring is anathema, unless a streamlined new process delivers extraordinary returns, it is difficult to imagine how the tally could come out in the taxpayer's favor without

significant sacrifice of quality control. With respect to firearms exports, taxpayers and the public at large should be concerned about pressures to cut corners that could result in authorization of irresponsible transfers. **In my view as a taxpayer, the ITAR fee structure is yet one more reason for retaining non-automatic and semi-automatic firearms on the USML, and should these weapons ultimately be transferred to the CCL, I urge public officials at the Commerce Department to explore charging a service fee for processing export license applications.**

### Conclusion

I appreciate the opportunity to comment on these rules. I am disappointed, however, that by and large they downplay the lethality of the weapons currently controlled in ITAR categories I and III. I realize that these documents were prepared for a different purpose than the materials posted to inform the global public about US government programs and policy, but **the difference between the tone and emphasis of the proposed rules and the public presentation of US policy on the export of small arms and light weapons over the past twenty years is striking.** By contrast to the public statements and documents, including the 2017 Congressional testimony by a State Department official, the emphasis in these regulations is on reducing transaction costs for industry rather than promoting the public good, including national security and public safety.

In response to public comments on the proposed regulatory changes, I hope that the Departments of State and Commerce will reconsider the proposal to transfer any complete weapons from the USML to CCL. In the event that the proposed regulations go forward substantially unchanged, I can only hope that other countries will tighten and strictly enforce their own import restrictions to reduce the risk of diversion and misuse.

Thank you,

Susan Waltz  
Professor  
Gerald R. Ford School of Public Policy  
University of Michigan  
Ann Arbor, Michigan

[swaltz@umich.edu](mailto:swaltz@umich.edu)

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-7k53 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3043

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Flowers

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-53ys Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3044

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephen Roach Knight

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## General Comment

I oppose the proposed rule for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-tol4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3045

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Salinda Tyson

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## General Comment

On May 24, the Trump Administration formally proposed a new rule to loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

The rule change would make the world a far more dangerous place because:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-1njp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3046

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymouse

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## General Comment

The idea that exporting and selling guns to other countries is just another sale seems absolutely ridiculous to me. This is not like shipping apples overseas. Apparently farmers of some products are now being impacted with tariffs, but we want to make it easier to sell guns?? How does this make sense? It's also looking like Russians may have made political contributions to our elections via the NRA. I'm sure I have a lot of company in thinking that this is crazy.

Thank you for your time and consideration. I hope you will vote against this change in rules.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-285j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3047

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Loren Libe

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## General Comment

I strongly OPPOSE the proposed rule.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-qjz1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3048

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Kasten

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-946j-sc0t <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3049

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Peeples

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## General Comment

Loosening the regulations over gun exports increased the risk that dangerous weapons could end up in the hands of international criminals. The proposed rule does not adequately address our security needs, terrorist threats, and the need for transparency so Congress and the public may understand the impact of these rules.

The administration should consider other alternatives to better balance the important interests at stake. The rule change removes licensing requirements for brokers, increasing the risk of trafficking, and removes the State Dept. block of 3D printing of firearms. effectively enabling such printing of lethal weapons in the US and around the world.

American citizens want more regulations on firearms especially concerning shipments that could make terrorism even more likely. We do not want less regulatory action, we want more rregulations on guns and selling guns.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-9ibi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3050

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lucille Gervase

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## General Comment

The rule change would make the world a far more dangerous place:

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Dep't is ill equipped to handle the technicalities that make arms exports a reasonably safe endeavor.

Please do NOT approve the change

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-68us Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3051

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Everard Davenport

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## General Comment

I am deeply troubled by loss of all reasonable controls of articles which may be used to kill human beings. Of particular concern are:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

The Commerce Department does not have the resources to enforce export controls.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

One is merely offensive - the cost of licenses should be borne by end users and not transferred to the rest of us.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-al2y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3052

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brynn Stanley

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-mb74 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3053

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shirley Conroy

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## General Comment

PLEASE delay and review again:

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-ycpm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3054

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-ol7n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3055

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bedford Silvey

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## General Comment

Please keep arms traffic actions under the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-k7gm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3056

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** George Menassa

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## General Comment

I am strongly opposed to the proposed rule change. State must maintain control of such sales and Congress needs to be informed of these sales.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-uonf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3057

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Allison Gunn

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-27kr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3058

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hazel Ryon

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## General Comment

My name is Hazel Ryon. I oppose the transfer of oversight of firearms export from the state to commerce department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Please let us know if you did this and how long it took. It should take one minute or less.

Thank you!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-fy5o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3059

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jeanne cormier

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## General Comment

fl just read about the following and I am opposed to more guns being sold

"On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-49el Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3060

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Evan Traylor

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-z86r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3061

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-7awm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3062

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeff Abramson

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## General Comment

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

Please see full comments in the attached document.

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## Attachments

ProposedUSMLCatIItoIIIChanges\_Comments\_Abramson

Comments re: ITAR Amendment - Categories I II, and III; EAR Amendment - RIN 0694-AF47

Jeff Abramson

July 9, 2018

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests. While my comments below are as an individual concerned U.S. citizen, they are informed by my work as a senior fellow at the Arms Control Association, coordinator of a global network of professionals engaged on these issues --the Forum on the Arms Trade--, and former leader within the international Control Arms campaign that championed the creation and now implementation of the Arms Trade Treaty.

In addition to these comments, I commend to reviewers the comments by experts listed by the Forum on the Arms Trade, including: Colby Goodman, William Hartung, Christina Arabia; Adotei Akwei (on behalf of Amnesty International USA); and John Lindsay-Poland, which delve into many of these points in much greater detail.

Specific concerns include:

#### **Loss of Congressional oversight**

In 2002 Congress amended its notification threshold so that it would be informed of potential commercial sales of firearms under USML category I when they were valued at just \$1 million, as opposed to \$14 million for other major weapons sales. Such notifications have been instrumental in forestalling unwise sales, including last year to Turkey and the Philippines. No similar statutory requirement of congressional notification exists for most arms sales under the CCL, meaning Congress would lose its oversight role on these weapons.

#### **Public reporting should be improved, not weakened**

The public gains some insight into the transfer of weapons via Congressional notifications, and also through the State Department's 655 report and Blue Lantern investigations report. Those reports could provide much more detail, such as the number of specific weapons involved and other data, rather than broad categorical details (655 report). Commerce reporting provides even less data, with similar reports covering around 20 countries per year. We deserve better transparency, not worse. If this transfer of authority moves forward, the Commerce department should be required to improve its reporting.

#### **Non-sensical to no longer consider these military weapons/defense articles**

The transfer of regulatory authority to the Commerce Department is claimed to be wise because these weapons no longer "provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use," and further because many "are widely available in retail outlets in the United States and abroad."

Applying this general approach--taken from the larger export reform initiation--falls apart when we are looking at firearms and their ammunition. These weapons are and should be controlled because a



significant amount of violence that occurs, including against U.S. military and law enforcement personnel, is inflicted by small arms. Research indicates that the types of weapons being transferred to Commerce control—AR-15s and AK-47 style assault rifles and their ammunition—are “weapons of choice” of drug trafficking organizations in Mexico and other Latin American countries. Many can also be easily converted to fully automatic weapons, which will remain under USML control. U.S. military members often operate their fully-automatic-capable weapons in a semi-automatic or less-than-automatic mode. Plus, many sniper rifles to be moved to Commerce control are in U.S. military use.

In addition, in many of the countries where these weapons are likely to be marketed, they are considered military weapons and tightly controlled. As currently proposed, they would also remain on the US Munitions Import List (USMIL), which is proper. Why they would therefore not remain on a similar export list is illogical.

Being commercially available in the United States is not a good indicator of whether these weapons merit the oversight of the State Department, which is better tasked with weighing non-commercial concerns. Nor is it proper to consider these weapons somehow safer than others on the USML.

### **Upsetting norms on human rights as relates to the arms trade**

The United States maintains strong laws against the provision of arms where certain human rights abuses are of concern (even if we do not always live up to those laws). Some of those laws may not apply to items in the 500 series. And although the State Department will be consulted in licensing decisions, it is difficult to see how this new approach would strengthen the ability of DRL and others concerned about human rights to forcefully insert human rights into arms sales decisions.

At a time where the global community must make the arms trade more responsible, these proposed changes would make its largest arms dealer, the United States, appear less responsible and less concerned about the human rights implications of the arms trade.

### **Making 3-D printing easier is dangerous**

It is unfathomable how allowing untraceable 3-D printing of firearms serves U.S.-recognized goals to combat illicit trafficking of firearms. Our country has agreed to support the Program of Action (PoA) on small arms and light weapons and the International Tracing Instrument (ITI), has signed accords on arms transfers and tracing in the Americas, and argued for why these efforts are so important. The United States also is the world’s largest donor, as I understand it, to helping countries build their ability to trace weapons, secure weapons stockpiles, and to destroy those stocks when warranted. Yet, this transfer of authority to Commerce appears to open the door to unfettered 3D printing, which threatens to undermine nearly all those efforts.

### **Overall**

At a fundamental level, U.S. arms are not like any other commodity and should not be treated as such. These are first and foremost killing machines. The over-emphasis on economic security threatens to jeopardize higher priorities, including peace and security concerns. If more weapons flow to countries with poor human rights records, norms around responsible weapons use and transfer will be harder to build and uphold.



This analysis is built upon documents and comments currently available at  
<https://www.forumarmstrade.org/catitool.html>

Including:

- ["Proposed Firearms Export Changes: Key Challenges for U.S. Oversight,"](#) (see also attached 14 page document), Center for International Policy, William Hartung, Colby Goodman, Christina Arabia
- [Arguments against retail availability criterion \(pdf\)](#), public comment by John Lindsay-Poland, Global Exchange
- ["Examples of Firearms Transferred to Commerce Under New Export Rules \(pdf\),"](#) Violence Policy Center, contact Kristen Rand
- ["Business with A Bang: How the Proposal to Loosen Arms Export Regulations Threatens Human Rights,"](#) Nate Smith, Amnesty USA, June 15, 2018 and [Public Comment 41](#) from Adotei Akwei (pdf)
- ["Trump Favors Arms Industry in Effort to Loosen Export Controls,"](#) Jeff Abramson, Issue Brief, Arms Control Association, June 7, 2018.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-3dj3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3063

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen DunwoodieAman

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## General Comment

Keep the jurisdiction for exporting assault weapons under the State Department!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-obgy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3064

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Nordmann

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## General Comment

My name is Suzanne and I'm a voter in San Diego, CA. As a victim of gun violence, I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. T

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-sf03 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3065

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Baldwin

**Organization:** Esterline Technologies Corp.

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## General Comment

See attached file(s)

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## Attachments

Esterline\_Comment\_DOS\_RIN\_1400-AE30



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July 9, 2018

Sarah Heidema, Director  
Office of Defense Trade Controls Policy  
Bureau of Political-Military Affairs  
U.S. Department of State  
2401 E Street NW  
Washington, D.C.

ATTN: Request for Comments Regarding Reform of USML Categories I, II, and III  
Public Notice 10094, RIN 1400-AE30, 83 FR 24198

Dear Ms. Heidema:

Esterline Technologies Corporation supports the goals and objectives of the Export Control Reform (ECR) Initiative, and submits the following comments on the reform of USML Categories I, II, and III:

#### **Summary of Comments and Recommendations**

This section outlines our main comments, each of which is explained more fully in the remainder of this letter.

1. Keep the Commerce Control List free of AECA brokering.
2. Coordinate changes to USML Categories I, II, and III with changes to the United States Munitions Import List.
3. Clarify classification of propellant containers and combustible ordnance components.
4. Address conflict with companion rule 83 FR 24166.

#### **Comments and Recommendations**

##### **1. Keep CCL free of AECA brokering**

One of the main advantages of ECR is that items on the CCL are not subject to the brokering requirements in section 38(a)(1) of the Arms Export Control Act (AECA) and 22 CFR 129. This advantage has been highlighted by the U.S. Government in public

remarks, such as Under Secretary Hirschorn's address to the BIS Update 2014 Conference.

Absence of brokering controls for CCL items has more significance than the absence of double licensing. Currently, items subject to the CCL do not require registration or licensing under 22 CFR 129, period. Once an item is determined to be on the CCL, it is clear that it is not subject to brokering, so there is no need to review the USMIL or the requirements in 22 CFR 129 before engaging in business. Knowledge that items on the CCL are not subject to brokering simplifies and streamlines transactions. Addition of brokering requirements for any item on the CCL would be an unwelcome development as it would introduce a significant complicating factor.

Esterline recommends DDTC reform USML Categories I, II, and III without introducing brokering controls to items in the CCL.

## **2. Coordinate changes to USML Categories I, II, and III with USMIL**

The proposed rule would add the need to review the USMIL for activities that are not imports to the United States. Classifying items against multiple control lists for a single transaction increases the cost and complexity of U.S. export controls.

Esterline recommends DDTC coordinate its change to USML Categories I, II, and III with the Bureau of Alcohol, Tobacco, Firearms, and Explosives so that a corresponding change is made to the USMIL at the same time. This would eliminate the need to consider both the USML and the USMIL when deciding whether a transaction involves brokering.

## **3. Clarify classification of both combustible and consumable case components.**

With regard to the proposed paragraph III(d)(7), Esterline suggests changing the text from

(7) Cartridge cases, powder bags, or combustible cases for the items controlled in USML Category II

to

(7) Cartridge cases, powder bags, charges, propellant containers, or combustible cases for the items controlled in USML Category II, or "specially designed" parts and components therefor.

Alternately, include an explanatory note:

Note to paragraph (d)(7): combustible cases include propellant containers for mortar systems and artillery charges, consumable case sets that include both combustible and inert parts and components, and their parts such as closure tabs and interfaces.

This change would more clearly describe the range of articles that DDTC appears to be intending to capture in this paragraph, and would simplify the classification of their parts and components which are inherently for military end use.

#### **4. Address conflict with companion rule 83 FR 24166**

The proposed rule is in conflict with the companion Commerce Department proposed rule, 83 FR 24166, Docket No. 111227796-5786-01, RIN 0694-AF47. This leaves items transferred from the USML to the CCL potentially without a controlling ECCN.

Esterline recommends DDTC coordinate with BIS to resolve this conflict.

The BIS proposed rule states:

Category III of the USML, entitled "Ammunition/Ordnance," encompasses ammunition for a wide variety of firearms that may have military, law enforcement or civilian applications. Ammunition that has only or primarily military applications would remain on the USML as would parts, production equipment, "software" and "technology" therefor.

The State Department proposed rule states with respect to USML Category III:

Additionally, paragraph (c), which controls production equipment and tooling, will be removed and placed into reserve. The articles currently covered by this paragraph will be subject to the EAR.

In effect, the BIS proposed would receive specific production and test equipment for conventional ammunition into ECCN 0B505, while the State Department proposed rule would move all production and test equipment for ammunition and ordnance to the CCL, conventional or otherwise.

ECCN 0B505 would only control equipment specially designed for the production of ammunition and ordnance that is controlled in USML Category III if it falls within the list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment." This list is less than the scope of production equipment that will no longer be controlled in USML Category VIII(c) by the proposed companion rule, 83 FR 24198.

Similarly, ECCN 0E505 would not control technology for the technology for equipment specially designed for the production of ordnance, or technology for the software specially designed for such equipment.

A number of the articles proposed for USML Category III by 83 FR 24198 are not conventional ammunition, and their specially designed production equipment exceeds the specific list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment."

For example, production of combustible ordnance requires specialized production machines that do not fall within the list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment." Under the proposed rules, these specialized machines would fall outside both the USML and ECCN 0B505.

**Summary**

Thank you for the opportunity to comment on the proposed reform of USML Categories I, II, and III. Please feel free to contact me if you have any questions about the comments and recommendations provided.

Regards,

A handwritten signature in black ink, appearing to read "Richard Baldwin", followed by a long horizontal flourish.

Richard R. Baldwin  
Director, Trade Compliance Technology  
Esterline Technologies Corporation



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-mi3w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3066

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Fleisher

---

## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. Please help us to protect the lives of innocent Americans. As a student, I am begging you to keep classrooms safe and restrict gun purchasing access, not loosen it. Thank you for hearing your citizen's voices.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-ypvb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3067

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheri Rotolo

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## General Comment

I strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It would remove the State Department ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally.

It would remove licensing requirements for brokers.

Would stop the program that inspects pre-license guns and issues reports.

Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism.

There is NO need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-3ooq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3068

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Plumley

---

## General Comment

I am completely opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-biga Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3069

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Miriam Krugman

---

## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-9ovh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3070

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Plumley

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## General Comment

I am completely opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-y1nz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3071

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Hardy

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## General Comment

I am an active member of San Diego 4 Gun Violence Prevention and it has come to my attention that the Trump Administration is proposing to transfer licensing and oversight of firearms exports from the State Department to the Department of Commerce. It is my opinion that if this occurs, more firearms will get in the hands of criminal organizations, human rights abusers, and terrorist groups and is being pushed to open up international markets to compensate for lagging domestic gun sales. I am vehemently opposed to this proposed change for these reasons:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

Please consider not implementing this proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-2pcc Comments Due: July 09, 2018
---------------------------------------------------------------------------------------

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3072

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michele Berro

---

## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-ovpw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3073

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-r8cc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3074

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-tifc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3075

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Helen Hayes

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-d0zg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3076

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Roth

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-5zdp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3077

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Beth Levin

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-4du0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3078

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Faucette

**Organization:** Mark Barnes & Associates

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## General Comment

See attached file(s)

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## Attachments

ECR Parts Comment

**Comment on Proposed Rule for “International Traffic in Arms Regulations: U.S.  
Munitions List Categories I, II, and III”**

**RIN 1400–AE30**

**Comment on Proposed Cat. I(g) and Cat. I Note 1**

This law firm, Mark Barnes & Associates, submits this comment on behalf of our clients engaged in the manufacture of firearms and associated parts. The purpose of this comment is to request that the final rule clarifies Cat. I(g)’s applicability to parts such as machinegun barrels that are commonly used in both semiautomatic and fully automatic firearms.

The proposed Cat. I(g) would list: “Barrels, receivers (frames), bolts, bolt carriers, slides, or sears specially designed for the articles in paragraphs (a), (b), and (d) of this category.” The articles in paragraphs (a), (b), and (d) of Category I would encompass firearms that use caseless ammunition, fully automatic firearms to .50 caliber inclusive, and fully automatic shotguns. In other words, Cat. I(g) would control barrels, receivers, bolt carriers, slides, or sears (“Parts”) specially designed for fully-automatic firearms.

The proposed rule includes Note 1 to Category I which clarifies that “Paragraphs (a), (b), (d), (e), (g), (h), and (i) of this category exclude: . . . parts, components, accessories, and attachments of firearms and shotguns in paragraphs (a), (b), (d), and (g) of this category *that are common to non-automatic firearms* and shotguns. The Department of Commerce regulates the export of such items.” (emphasis added).

Aside from a sear and receiver, it is extremely rare for any part or component of a fully-automatic firearm to not be common to a non-automatic firearm. Almost all fully automatic firearms have semi-automatic variants available on the commercial market. For example, FN USA manufactures and sells to the public a semi-automatic variant of the belt fed M249 Squad Automatic Weapon (SAW) with the only distinction from the fully automatic version being the receiver and fire control group. (<https://fnamerica.com/products/rifles/fn-m249s/> “Semi-auto replica of the government-issue FN M249 SAW”). The barrel is identical to the fully automatic version. Accordingly, it would follow that a military M249 barrel would be controlled by the Department of Commerce.

Many companies will buy fully automatic firearms with destroyed receivers (“parts kits”) from the military or police departments to construct and sell semi-automatic variants to the public. These parts kits generally consist of all parts other than the receiver (which is usually cut into three parts with a torch). Additionally, Mil-spec M4 and M16 fully automatic bolt carriers as well as barrels specially designed for fully automatic fire, are often sold with and made for civilian AR-15s.

Based upon the plain reading of the proposed Cat. I Note, some clarification is needed as to whether barrels, receivers (frames), bolts, bolt carriers, slides, or sears are non-ITAR simply because they are incorporated in semi-automatic variants on the civilian market, as almost all firearms parts, especially barrels, can be common to both semi-automatic and fully automatic firearms. We think that unless a part converts a firearm to fully automatic functionality, it should be controlled by the Department of Commerce.

Should you have any questions on this comment, please do not hesitate to contact Michael Faucette at (202) 626-0085 or [michael.faucette@mbassociateslaw.com](mailto:michael.faucette@mbassociateslaw.com).

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-tayq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3079

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stephanie Nystrom

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-kk77 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3080

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anna Seidman

**Organization:** Safari Club International

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## General Comment

See attached file(s)

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## Attachments

07 08 2018 - Safari Club International Comments on RIN 1400 AE30 and RIN 0694-AF47





July 9, 2018

Via <http://www.regulations.gov>

Office of Defense Trade Controls Policy  
Department of State  
[DDTCPublicComments@state.gov](mailto:DDTCPublicComments@state.gov)

Regulatory Policy Division,  
Bureau of Industry and Security,  
U.S. Department of Commerce,  
Room 2099B,  
14th Street and Pennsylvania Avenue NW,  
Washington, DC 20230.

**Re: Safari Club International Comments on Proposed Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories, I, II and III, Docket RIN 1400 AE30, DOS-2017-0046; and Proposed Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML), RIN 0694-AF47, Docket No. 111227796-5786-01.**

Dear Sirs:

Safari Club International (SCI) submits these comments in support of the U.S. Department of State's proposed amendments to the International Traffic in Arms Regulations (ITAR) to revise Categories I, II, and III of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. SCI also supports the Department of Commerce, Bureau of Industry and Security's proposed determination that these items no longer warrant control under the U.S. Munitions List (collectively referred to as "proposed regulations").

SCI does not support the proposed regulations' finalization and implementation of a modified procedure for the temporary export of firearms and ammunition by individuals who wish to travel outside the U.S. for recreational hunting and shooting purposes. The procedure requires travelers to use the Automated Export System (AES) to register their personal firearms and ammunition. This is an inappropriate and unworkable system for the individual who wishes to temporarily export his/her firearms. As an alternative, SCI requests that the proposed regulations be modified so that they delete the AES registration requirement and formalize and codify the Form 4457 process to ensure its consistency and use by all Customs and Border Protection (CBP) officials.

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms

July 9, 2018

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## **Safari Club International**

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 50,000 members worldwide, many of whom are U.S. residents who travel with their firearms for hunting and recreational shooting around the world. They are individuals, not businesses, who seek only to bring their own property with them when they travel and return to the U.S. with that same property. Their activities are legal and are regulated by the countries they visit to hunt and shoot.

## **The Origin of the AES Registration Requirement**

The export of firearms is controlled under the ITAR, which is administered by the U.S. Department of State, Directorate of Defense Trade Controls (DDTC). ITAR regulations have historically included an exemption under 22 CFR §123.17(c) allowing U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges. This exemption is widely used by hunters and other sportsmen, who travel overseas with firearms to be used for sporting and other legal purposes. To use the exemption, the U.S. person must declare the firearms and/or ammunition to CBP, carry the firearms as part of their baggage, and not transfer ownership while abroad.

In 2011, DDTC published a Federal Register notice of proposed rulemaking that principally revised the exemption related to personal protective equipment, but also included a requirement that those traveling with firearms register through the Automated Export System (AES): “The person. . . presents the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System per §123.22 of this subchapter. . . .” 76 Fed. Reg. 16353, 163534 (Mar. 23, 2011).

The system required those registering to provide an Employer Identification Number (EIN), available only to commercial enterprises. The registration system also involved procedures far too complicated and burdensome than necessary for individuals seeking only to travel with their personal equipment. Because the registration system imposed registration obligations that would have forced hunters and shooters to make false representations to the Internal Revenue Service, jeopardized their ability to obtain permits to import the wildlife they successfully hunted, and imposed burdensome obligations unnecessary and inappropriate for non-commercial importers, CBP agreed to postpone the implementation of the registration requirements and to continue the use of Form 4457 as the mechanism to facilitate temporary firearms export. Even that solution presented problems. Due to the inconsistencies in the way that CBP personnel issued the forms, U.S. residents have encountered difficulties in taking their firearms to foreign countries (e.g. South Africa) that attribute much greater significance to Form 4457 than does the U.S.

## **Collection of Data Through AES Registration is Inappropriate**

Without good reason, the proposed regulations would reactive the AES registration requirement for individuals seeking to temporarily export their firearms and ammunition.

Consistent with the ITAR requirements previously applicable to temporary exports of the firearms and associated ammunition covered by this rule, [Bureau

**Safari Club International - Washington DC Office**

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SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms

July 9, 2018

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of Industry and Security (“BIS”)] is proposing to modify § 758.1 of the EAR to make clear that exporters would continue to be required to file Electronic Export Enforcement (EEI) to the Automated Export System (AES) for transactions involving such firearms and associated ammunition that are otherwise authorized pursuant to License Exception BAG.

83 Fed. Reg. 24174. The purpose of the registration system is not to facilitate the temporary export and reimport of firearms and ammunition. According to CBP, the collection of export data through the registration is designed to help with the “compilation of the U.S. position on merchandise trade” and is an “essential component of the monthly totals provided in the U.S. International Trade in Goods and Services (FT900) press release, a principal economic indicator and a primary component of the Gross Domestic Product.” <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf>

The government has no need to collect this data. The data, provided by individuals who wish to temporarily export and then re-import the same personally owned equipment, has nothing to do with the “U.S. position on merchandise trade” or the “Gross Domestic Product.”

The only purpose for the collection of data from individual hunters who travel with their firearms is likely to enable the government to maintain records on these individuals and their legal activities abroad. In the proposed regulations, the BIS acknowledges that the intention of the AES filing system was to “track such temporary exports of personally-owned firearms and ammunition.” SCI strongly opposes this attempt to “follow” and retain records of the individuals who travel with their firearms for hunting purposes. These individuals have taken no actions meriting the government’s desire or need to collect and maintain data on their activities. The government should remove the requirement to collect such data.

### **The Proposed Regulations Recognize Flaws in the Registration System**

The proposed regulations provide the public with the opportunity to comment on whether CBP has been able to remedy the problems identified when CBP first attempted to activate and implement the new requirement. The drafters also condition the reactivation of the AES registration requirement on CBP’s success in remedying the problems that plagued the introduction:

Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP’s existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition. BIS will also take into consideration any public comments submitted on this aspect of the proposed rule regarding imposing an EEI filing requirement in AES, as well as

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms

July 9, 2018

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comments on the current practice of using the CBP Form 4457, as well as any other suggestions on alternative approaches for tracking such information.

83 Fed. Reg. 24174. AES registration should not be required as CBP has not remedied the problems that plagued the initial attempted implementation of the system.

### **The AES Registration System Requires Individuals to Provide False Information to the Internal Revenue Service**

The AES registration system continues to require persons temporarily exporting firearms or ammunition to present “the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System.” The AES system requires an EIN before a user can submit any data. The Census Bureau administers the AES system, and their website still includes the following FAQ:

**The Internal Revenue Service (IRS) site states that an Employer Identification Number (EIN) is for use in connection with business activity only. It further states, do not use your EIN in place of a Social Security Number. The information provided by the Census Bureau and the IRS is conflicting.**

The IRS publication titled “Understanding Your EIN” which is located on their webpage (<http://www.irs.gov/pub/irs-pdf/p1635.pdf> [external link]) states that “...Employer Identification Number (EIN) is for use in connection with business activity only, do not use your EIN in place of a Social Security Number”.... However, for the purposes of registering or filing in the AES you can and should use your EIN. While it is not specifically stated, an EIN can be obtained for government reporting purposes when a person does not own a business.”

<https://www.census.gov/foreign-trade/regulations/ssnfaqs.html>. The Census Bureau site expressly tells individual exporters to ignore the IRS’s instructions and to misrepresent themselves as businesses, in order to obtain an EIN. The IRS site contains no instructions providing such an exception.

The Census guidelines instruct individuals to select “Sole Proprietorship” as the “type of legal structure applying for an EIN,” which is explained by IRS as: “sole proprietor includes individuals who are in business for themselves, or household employers.” The individual is further required to select “started a new business” as the reason why the sole proprietor is requesting an EIN. For an individual seeking to travel overseas with their firearms, this information is confusing, false and entered only to obtain the EIN.

As nothing has changed to remedy this problem since the AES registration requirement was originally imposed, the regulations should not include this requirement.

### **The AES Registration System is Designed for Commercial Operations and Is Overly Complicated for the Individual Exporter**

Safari Club International - Washington DC Office

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## SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms

July 9, 2018

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Despite the years that have passed since CBP's attempt to require individuals to register through the AES system for the temporary export of their firearms, the agency has not made meaningful progress in reducing the overly complicated process for registration. The system is designed for businesses whose repeated use of the system merits the time and patience required for registration. The online AES Direct Users' Guide (which contains no reference to individuals, temporary export, or firearms) is a 39-page manual that an individual would be required to learn in order to register with the system. The registration mechanism is unnecessarily burdensome and complicated for the private individual who does not wish to participate in commercial trade but merely wants to temporarily take his own firearm with him outside the U.S. for a recreational hunt or shoot.

### **Individuals Identifying Themselves as a Commercial Enterprise Could Jeopardize Their Ability to Import Legally Hunted Animals**

The requirement that individual hunters obtain an EIN, recognized by the IRS for business purposes only, could potentially jeopardize the ability of hunters to import some sport-hunted trophies from abroad. The U.S. Fish and Wildlife Service (FWS) prohibits the importation of many sport-hunted species for commercial purposes. A hunter who registers as a business for the purpose of leaving the country and exporting the firearms he plans to use to hunt outside the United States, risks the FWS prohibiting the hunter from importing his trophies and otherwise penalizing the hunter.

### **The AES Registration System Does Not Replace the Use of Form 4457**

As mentioned above, the proposed regulations did not intend the AES registration requirement to replace CBP Form 4457 for the temporary export and reimport of personally owned firearms. Even with the AES registration requirement, temporary exporters of firearms and ammunition will still need to obtain and complete Form 4457 and display it upon re-entry into the U.S. to prove that they did not acquire the firearms abroad. Because (1) the AES registration requirement and its purpose of tracking the activities of law-abiding hunters and recreational shooters are neither necessary nor appropriate for the temporary export activities of hunters and shooters, and (2) these individuals will continue to need to obtain and display Form 4457, the logical solution would be to abandon the AES registration requirement, retain the Form 4457 practice, and improve the mechanisms for issuing the latter.

### **Future Use of Form 4457 Needs to Reflect the Greater Significance of the Document Outside the U.S.**

While CBP has used Form 4457 as primarily a mechanism for determining whether the firearm being imported into the U.S. is the same property the individual exported when he or she left the country, other governments attribute greater significance to the document.

South Africa, for example, treats the form as a pseudo license of a U.S. resident traveling with a firearm. South African police have conditioned import of firearms into their country on the U.S. resident's possession of what South Africa considers to be a valid Form 4457. In 2017, this led

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms

July 9, 2018

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to problems for hunters traveling to South Africa when the CBP began issuing Form 4457s with already expired expiration dates. Although CBP explained that the agency attributes little meaning to the form's expiration date, South African officials considered the forms expired and prohibited hunters from entering the country with their firearms due to the apparent expired appearance of the forms.


The problem was exacerbated by different offices of CBP issuing different versions of the form, which also did not match the form available from CBP's website. After representatives of SCI and other organizations engaged in numerous discussions on the issue with CBP personnel, CBP adopted a temporary solution of issuing new forms with a future expiration date. CBP needs to adopt a more permanent solution that addresses the significance of the form in other countries, such as issuing forms without any expiration date.

**SCI's Recommended Resolution and Revision of the Proposed Rules**

SCI recommends that the drafters delete the AES registration requirement entirely for individuals and make it clear that registration is not required for those who wish to temporarily export their firearms from the United States. No tracking of the legal activities of these hunters and shooters should be conducted and no compilation of data about these individuals should be permitted. Instead, the drafters should formally codify the use of Form 4457 for individuals and should identify a single consistent standard for the form that contains no date that could be interpreted or misinterpreted by anyone as an expiration date.

Thank you for the opportunity to comment on these proposed regulations, and in particular to advocate for the removal of a process that should not be applied to individuals who wish only to temporarily export their firearms in order to engage in legal activities outside of the United States. If you have any questions or need anything further, please contact Anna Seidman, Director of Legal Advocacy Resources and International Affairs, [aseidman@safariclub.org](mailto:aseidman@safariclub.org).

Sincerely,



Paul Babaz  
President, Safari Club International

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-fice Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3081

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brian Wegener

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This proposed policy is especially bad in a time when the US government is turning away refugees flee violent conflict and violent gangs.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-t19m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3082

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Betsy Lindenberg

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-mqzs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3083

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Stenberg

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## General Comment

No! Too many guns everywhere!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-8o3m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3084

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joshua Blank

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-3i1f Comments Due: July 09, 2018
---------------------------------------------------------------------------------------

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3085

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Craven

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## General Comment

Please do not loosen the regulations on shipping guns overseas. More guns anywhere is not good! This is a cynical attempt by the NRA and the gun lobby to boost falling sales. Don't help them! Thanks.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-8nis Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3086

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lindsay Nichols

**Organization:** Giffords Law Center

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## General Comment

Please see attached.

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## Attachments

Giffords Exports Letter 7-9-18



July 9, 2018

**SUBMITTED VIA FEDERAL E-RULEMAKING PORTAL**

Director of Defense Trade Controls  
U.S. Department of State  
[DDTCPublicComments@state.gov](mailto:DDTCPublicComments@state.gov)

AND  
Regulatory Policy Division,  
Bureau of Industry and Security,  
U.S. Department of Commerce, Room 2099B  
14th Street and Pennsylvania Avenue NW  
Washington, DC 20230

RE: Docket Nos. DOS-2017-0046, BIS-2017-0004

**ITAR Amendment -- Categories I, II, and III and Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List (USML)**

This comment is submitted on behalf of Giffords and Giffords Law Center ("Giffords") in response to the Proposed Rules published by the Departments of State and Commerce on May 24, 2018 regarding the classification and administration of exports of certain firearms and ammunition. The Proposed Rules are complex and would represent a dramatic change in the regulatory structure governing firearm exports. We are concerned that the Proposed Rules may not adequately address our national security, foreign policy, international crime, or terrorism threats. In sum, we are concerned about potential loss of life. We also believe the Proposed Rules do not adequately address the need for transparency so Congress and the public may understand the impact of these Rules on potential weapons exports.

Giffords is committed to advancing common-sense change that makes communities safer from gun violence. Operating out of offices in San Francisco, New York, and Washington, DC, our staff partners with lawmakers and advocates at the federal, state, and local levels to craft and enact lifesaving gun safety laws, participate in critical gun-violence-prevention litigation, and educate the public on the proven solutions that reduce gun violence.



## THE PROPOSED RULES APPEAR DRIVEN BY THE INTERESTS OF THE GUN INDUSTRY

Even the National Rifle Association (NRA) admits that the Proposed Rules were drafted with “the goal of increasing U.S. manufacturers’ and businesses’ worldwide competitiveness.” These Rules are “designed to enhance the competitiveness of American companies in the firearms and ammunition sectors,” allowing firearms and ammunition “to be subject to a more business-friendly regulatory climate.”<sup>1</sup>

We are concerned that the Proposed Rules elevate the desire of American gun manufacturers to compete with international arms dealers over the danger that exported firearms will contribute to international gun crime and violence. The United States must not prioritize gun industry profits over human lives.

## THE PROPOSED RULES WILL DRAMATICALLY CHANGE THE LAW, RISKING NEW LOOPHOLES

We are concerned that the Proposed Rules, by shifting firearms and ammunition from the United States Munitions List (USML) to the Commerce Control List (CCL), would weaken oversight over exports of these items. As even the NRA has acknowledged, “items on the USML controlled under ITAR are generally treated more strictly,” whereas regulation under the CCL “is more flexible.” The NRA has also admitted that license applications for items on the USML are subject to “more stringent vetting” than items on the CCL.<sup>2</sup>

The Departments of State and Commerce, in drafting the Proposed Rules, have made some efforts to ensure that exports of firearms and ammunition will still be subject to oversight. But the dramatic nature of the proposed changes, and the complexity of the Proposed Rules raise serious concerns about hidden loopholes. Some areas of potential concern include:

- Congressional notification and the methods for Congress to disapprove of proposed firearm exports;
- The extent to which the Commerce Department monitors the end-users of its products; and the extent to which Congress and the public have access to information about the results of this monitoring;
- The online posting of designs for the production of firearms, and their use in the 3D printing of untraceable firearms;
- Firearms training provided to foreign security forces;
- The reporting of political contributions by gun exporters and related entities;
- The Commerce Department’s bandwidth to properly oversee these exports; and
- The regulation of brokers who act as middlemen in firearms transactions, and the threat that firearms will be diverted by these middlemen to violent ends.

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<sup>1</sup> National Rifle Association, *Trump Administration’s Proposed Rulemakings a Win-Win for America’s Firearms Industry*, *National Security*, <https://www.nra.org/articles/20190525/trump-administration-s-proposed-rulemakings-a-win-win-for-americas-firearms-industry-national-security>

<sup>2</sup> Ibid.



According to the State Department's Proposed Rules, "The Department of Commerce estimates that 4,000 of the 10,000 licenses that were required by the [State] Department will be eligible for license exceptions or otherwise not require a separate license under the EAR." This statement seems to directly contradict the statement in the Commerce Department's Proposed Rules that "BIS would require licenses to export, or reexport to any country a firearm or other weapon currently on the USML that would be added to the CCL by the proposed rule." The Commerce Department later clarifies, "The other 4,000 applicants may use license exceptions under the EAR or the "no license required" designation, so these applicants would not be required to submit license applications under the EAR." While we recognize that other forms of oversight may be available, this dramatic difference in the number of licenses raises our concern.

We are also particularly concerned that these changes will result in an increase in the number of untraceable firearms in circulation. As 3D printing technology becomes more widely available, the likelihood that it may be used to construct operable firearms that are exempt from serialization requirements increases. Under current law, the proliferation of 3D printed firearms is held in check by the Fifth Circuit's decision in *Defense Distributed v. U.S. Dep't of State*,<sup>3</sup> which upheld the State Department's decision that the posting of online data for the 3D printing of firearms fell within the USML. The Proposed Rules would throw that determination into question.

Inadequate gun safety laws cost human lives. When gun purchasers are not properly vetted and laws against gun trafficking are not properly enforced, guns often fall into the wrong hands and are used to perpetrate horrendous crimes and violence. The U.S. experiences this loss of life on a daily basis, with over 90 people killed each day. We do not wish to see a similar effect on an international level from the weakening of our laws regarding gun exports.

### **THIS CHANGE LACKS SUFFICIENT CONGRESSIONAL NOTIFICATION REQUIREMENTS**

We have not seen anything in the Proposed Rules that would continue Congressional notification requirements for any of the Category I firearms that are being moved to the CCL. There are several types of sales controlled under the Arms Export Control Act that require Congressional notification. Under current law, a certification must be provided to Congress prior to the granting of any license or other approval for transactions involving the export of a firearm controlled under Category I of the USML in an amount of \$1 million or more.<sup>4</sup> Congress then has the ability to enact a joint resolution prohibiting the export, which would prevent the State Department from licensing the sale. Congress generally is given 15 days or 30 days to review the transaction before a license can be granted, depending on the items being exported and the

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<sup>3</sup> 838 F.3d 451 (5th Cir. 2016).

<sup>4</sup> See 22 U.S.C. § 2776, 22 C.F.R. 123.15(a)(3).



country to which it is being exported. While there are Congressional notification requirements for certain products that are controlled under the CCL, it seems that such notification requirements would not be as broad that as under the USML.

Congress should continue to receive advance notification of transactions involving firearms and to have the opportunity to prohibit these exports when appropriate. The Proposed Rules should be strengthened to protect Congress's authority in this area.

#### **THE CHANGE MAY RESULT IN LESS TRANSPARENT END-USE MONITORING**

We are concerned about a possible reduction in the monitoring of the end-users of exported firearms and publicly available information about this monitoring. The State Department currently monitors the end-users of firearm exports through its Blue Lantern program. Public reporting of Blue Lantern information is mandatory<sup>5</sup> and there are readily available statistics about the results. While the Commerce Department also conducts end use monitoring, there does not appear to be as fulsome a public reporting requirement for these end use checks as under the Blue Lantern program.

The Proposed Rules do not discuss end use monitoring of the items being moved to the CCL. It is reasonable to assume that these items will fall under the general Bureau of Industry and Security end use check program. This end use check program is not as well-publicized or as formal as the Blue Lantern program, and only a very small percentage of exported items are reviewed. If the Proposed Rules move forward, this program must be strengthened to address the need to monitor the end-users of exported firearms and provide the public with information about the results.

#### **THIS CHANGE IGNORES THE MILITARY NATURE OF MANY FIREARMS**

The Proposed Rules are based on an assumption that automatic firearms are designed for and used by the military, and semiautomatic firearms are not "inherently military." This is inaccurate. Consequently, we question the President's determination that semiautomatic firearms and ammunition no longer warrant control under the USML.

In fact, members of the U.S. armed forces routinely use firearms in semiautomatic mode in combat conditions, and the designs of many semiautomatic firearms are inherently military. Assault rifles like the AR-15 were originally designed for military use. Earlier models included a selective fire option that allowed service members to switch easily between automatic and semiautomatic modes. The military included the option to fire in semiautomatic mode because military combat sometimes requires use of a firearm in

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<sup>5</sup> 22 U.S.C. §§ 2785, 2394, 2394-1a





semiautomatic mode. Shooting in semiautomatic mode is more accurate and hence more lethal.<sup>6</sup> In fact, some members of the military use the semiautomatic mode exclusively.

The fact that some gun enthusiasts “enjoy” shooting these weapons and have labeled this activity “modern sport shooting” or “tactical shooting” does not change the design or purpose of these firearms or the danger they pose in civilian hands. The horrendous rise in mass shootings our country has suffered and the frequency with which these firearms are used in these shootings testify to this danger.

Military-style semiautomatic firearms were used to perpetrate the tragedies that occurred in an elementary school in Newtown, Connecticut, at a music festival in Las Vegas, Nevada, at a workplace in San Bernardino, California, in a movie theatre in Aurora, Colorado, and at a high school in Parkland, Florida, among others. Because of the dangerous nature of these weapons, D.C. and seven states, including the populous states of California and New York, ban them.<sup>7</sup> Because of the military nature and serious lethality of these weapons; they belong on the USML.

#### **THERE ARE ALTERNATIVES TO THE PROPOSED RULES THAT HAVE NOT BEEN EXPLORED**

The real concern that seems to be driving this significant change in the way the U.S. government regulates firearms exports is that firearms and ammunition manufacturers are currently required to register with the State Department and pay a registration fee. According to the NRA, “Any business that manufactures an item on the USML, or even just a part or component of such an item, also has to register with the State Department and pay an annual fee, which is currently set at \$2,250. This registration is required even if the manufacturer has no intent to ever export the items. ... Manufacturers of items on the CCL, or their parts or components, do not have to pay an annual registration fee to the Commerce Department.”<sup>8</sup>

The registration fee appears to be the NRA’s primary concern with the current system for regulating the export of firearms and ammunition. The simple solution to this problem might be to waive the fee for manufacturers who do not, in reality, export these items. Waiving the fee would relieve industry of this “burden” without undoing the important policy choices made by the State Department in the regulation of these exports or requiring the Commerce Department to “reinvent the wheel” with respect to these regulations. While we would not necessarily support this proposal (it might shift the costs of manufacturer

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<sup>6</sup>With AR-15s, Mass Shooters Attack With the Rifle Firepower Typically Used by Infantry Troops, NY Times, Feb. 28, 2018, <https://www.nytimes.com/interactive/2018/02/28/us/ar-15-rifle-mass-shootings.html>.

<sup>7</sup> See Giffords Law Center to Prevent Gun Violence, *Assault Weapons* at <http://lawcenter.giffords.org/gun-laws/policy-areas/hardware-amunition/assault-weapons/>.

<sup>8</sup> National Rifle Association, *supra*.



registration to the taxpayers), we urge the Administration to carefully and thoroughly consider other alternatives to the Proposed Rules.

Sincerely,

A handwritten signature in black ink, reading "Lindsay Nichols". The signature is written in a cursive, flowing style.

Lindsay Nichols  
Giffords Federal Policy Director

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#### ABOUT GIFFORDS LAW CENTER

For nearly 25 years, the legal experts at Giffords Law Center to Prevent Gun Violence have been fighting for a safer America by researching, drafting, and defending the laws, policies, and programs proven to save lives from gun violence.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-6p5v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3087

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Klonowski

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## General Comment

Please retain the export of firearms within the State Department. Their more rigid oversight will help ensure that U.S. made firearms aren't used against our own servicemen and women.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-owg3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3088

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Wilson

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## General Comment

I oppose the rule change that would transfer firearms export regulations from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-7qzc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3089

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Thank you to Mom's Rising for the following information and why I am against the rule change:

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-vueo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3090

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Stine

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## General Comment

This is a bad idea that will take people's lives. I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals, places the cost of processing licenses on the U.S. taxpayers, and allows weapons to spread throughout the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-4glv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3091

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeremy Cronig

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-jp1h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3092

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maddy A

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-uxat Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3093

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ron Murray

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## General Comment

I SUPPORT moving the regulation regarding firearm exportation to the Commerce department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-nu6i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3094

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jonathan Boyne

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## General Comment

I oppose the proposed rule for the following reasons. The proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-95fx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3095

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shir A

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-q1er Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3096

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leigh Anne Jasheway

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

It's bad enough that our own children can't go to school without fear of being shot -- now we're trying to endanger the rest of the world for profit for the rich? Not to mention all the talk about fighting crime and drugs and now the Trump regime is attempting to make it easier for both to flourish throughout the world.

Stop this nonsense!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-aswb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3097

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jeannine coyne

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## General Comment

To Whom It May Concern:

At a time of instability in many areas of the world, this is a time to hold fast to the oversight role and responsibilities of the US State Dept. with regards to export of firearms. On May 24th President Trump proposed a new rule that would move this responsibility to the US Dept. of Commerce. This has potential negative consequences for our national security, international crime and terrorist threats. I strongly oppose any effort to move the monitoring of firearm exports from the State to the Commerce Dept. I further oppose any loosening of regulations of firearm exports as it would increase the risk of guns falling into the hands of terrorists and rogue nations.

Respectfully submitted,

Jeannine M. Coyne

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-78ea Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3098

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** CM Schneider

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## General Comment

The Trump administration's changes to gun regulations and its alignment with the NRA and gun manufacturers is disgusting. I oppose the rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-ylc4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3099

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bill and Marie Anonymous

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## General Comment

We strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The dangerous rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-boh7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3100

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Langdon

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-khgr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3101

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

We cannot make it easier for guns to get into other countries. We already know that many of the gangs in Mexico get their guns from the United States, and look at the problem it has caused that country. People are afraid to live there.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-2a4v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3102

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Aryeh Frankfurter

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-xtmk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3103

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Janet Yunghans

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-43au Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3104

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth McKanna

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. We need to be a leader in the area of gun safety and set an example of how to use guns responsibly. Moving the oversight to the Commerce Department indicates we as Americans just makes it seem that guns are merely a commodity for profit instead of a product that we must use and make available to others to use judiciously, only for reasonable and necessary purposes. Please do not permit this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-pljm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3105

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Gun sales should not be for profit as their sole purpose is to kill, but weapons of war certainly should not be sold around the world for profit.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-u0jm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3106

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Gross

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake. I am opposed to the way this is being proposed.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-edgr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3107

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Fern Wolkin

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-pkyl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3108

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer S

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-a84n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3109

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Rowan

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## General Comment

Please do not do this. Our world is dangerous enough without flooding it with more lethal weapons. Believe it or not, there are some things more precious than money.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-umyh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3110

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Canning

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-k18l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3111

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Paty

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## General Comment

I am Kathleen K Paty and have traveled with my father to Japan and my husband to Morocco. One of my sons stood at the DMZ in Korea and the other watched the border between Egypt and Israel. I am a voter and have been for years. I support the second amendment but this is not a constitutional issue.

This rule change will make it possible for violent gangs to purchase, made in the USA, firepower, It is possible, even likely, our failure to control sales of weapons for the gangs to take over Mexico and threaten our southern border. We do not need to be stupid!

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## Attachments

Wepon Export

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government — i.e., taxpayers — will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency – the Commerce Department – whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-tq5h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3112

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-ouuy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3113

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Saba Aftab

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-qha4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3114

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jack Cook

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## General Comment

As the owner of a small gunsmithing operation in rural SC I urge you to transfer control of small firearms and ammunition from the State Department to the Commerce Department. It is imperative to my business that we roll-back the horrible rules that you updated in July, 2016. Effective 22 July 2016, gunsmiths suddenly found themselves subject to the regulatory authority of the Arms Export Control Act (AECA) as administered by the State Departments Directorate of Defense Trade Controls (DDTC). Regulators suddenly determined that traditionally routine gun repair and enhancement services now constitute firearms "manufacturing" and mandatory registration of my small, home-based business under International Traffic in Arms Regulations (ITAR). Tis ITAR directive advises gunsmiths to stop what they are doing and pay up or face fines and prison! (Violations under the ITAR can bring civil penalties of \$500,000 per violation and criminal penalties of up to \$1 million per violation along with up to 20 years in prison).

These rules are terribly confusing. I submitted some very direct questions to you and have never received a reply. I developed a list of typical customer service requests that raise concern with respect to ITAR registration. Specifically, I requested your determination on these examples:

- 1) Drilling, threading and installing sling swivels on rifle forend (and buttstock) for sling and/or bipod (requires drill press and screw threading)
- 2) Fabricating replacement parts - such as firing pins for rifles and pistols (requires lathe turning, milling, grinding, and polishing)
- 3) Installation of Cominolli safety special option on Glock pistols (requires cutting of frame slot with Foredom tool and fixture)
- 4) Rifle barrel setback - to correct headspace and service misfire issues (requires lathe and chambering reamer)
- 5) Slide and frame milling and cuts adding cocking serrations for improved handling, chamfering and dehorning for concealed carry, and enhanced eye appeal (requires mill, surface grinder)
- 6) Installation of gunsmith fit barrel - for accuracy upgrade or to address headspace issues (requires milling and/or TIG welding of hood and foot to precise fit)
- 7) Installation of scope mount on early rifles - for hunting, competitive shooting, and sporterizing



(requires drilling and tapping of mounting holes)

8) Re-crowning barrel - to improve or repair rifle accuracy (using lathe)

9) Installing 1911 Beavertail - to improve comfort and aim (requires precision cutting of frame, typically with mill)

10) Installing Sako-style extractor on Remington Model 700 rifle - primarily for improved reliability (requires milling and drilling of rifle bolt)

The above are, I think, a typical sampling of services that might reasonably be encountered in any gunsmith practice. Under State Department export control rulings all the above would likely constitute manufacturing and are illegal under ITAR absent payment of a large export fee. I urge you to transfer administration over to the Department of Commerce.

Obviously, the ITAR fee is a significant burden on a small gunsmith shop and will be an important factor in determining the viability and directions of my planned endeavor. I am hopeful that you will properly transfer administration and governance to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-jc2z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3115

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rich Reiner

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-cb14 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3116

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sayre Weaver

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## General Comment

I am a former Los Angeles County Deputy District Attorney and a lawyer who has practiced law for over 30 years and represented local governments seeking to address gun violence in their jurisdictions. I serve on the American Bar Association's Standing Committee on Gun Violence and in that capacity have worked on nationwide gun violence prevention issues. I am opposed to the proposed rule changes because both individually and collectively they greatly increase the risk of illegal firearms trafficking in this country and abroad. Small arms are already trafficked at an alarming rate into embargoed countries and into countries where they are used in conflicts in which children have been forced to be soldiers. (1) The proposed Treatment of semi-automatic assault rifles as "non-military" despite their use by U.S. troops and their use in non state and state armed conflicts, their easy conversion to fully automatic firearms, and their prohibition under the laws of many U.S. states and other countries, is contrary to the statutory framework enacted by Congress to regulate export of firearms. (2) The proposed rule would eliminate Congressional oversight for important firearms export deals and removal of Congressional oversight is directly contrary to the congressional intent of the statutes the proposed rule is meant to implement. (3) The proposed rule changes would relieve gun manufacturers of the cost of processing their licenses and imposed on taxpayer. (4) The proposed rule changes moving many approval functions out of the State Department to Commerce reduces control over firearms exports by eliminating the State Department's Blue Lantern program and the oversight that the State Department has been able to effect in denying licenses to international human rights violators through the registration system and its database. (5) The proposed rule changes enable unchecked firearms production in the U.S. and exports by removing the block on 3d printing. (6) The proposed rule changes transfer firearms export regulation to Commerce whose primary mission is to promote trade, which is contrary to congressional intent with respect to the statutes governing export of firearms. Firearms are used to kill thousands of people every year in acts of organized crime, drug trafficking, and human rights violations. We need more controls over the export of these weapons, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-5afq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3117

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Russell Paty

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## General Comment

I am Russell Paty and have traveled around the world three times. One of my sons stood at the DMZ in Korea and the other watched the border between Egypt and Israel. I am a voter and have been for years. I support the second amendment but this is not a constitutional issue.

This rule change will make it possible for violent gangs to purchase, made in the USA, firepower, It is possible, even likely, our failure to control sales weapons for the gangs to take over Mexico and threaten our southern border.

I oppose the proposed rule

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## Attachments

Weapon Export

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government — i.e., taxpayers — will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency – the Commerce Department – whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-gvbj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3118

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kaye Exo

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## General Comment

I oppose moving export licensing of firearms from State Dept to Commerce Dept. It eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on US taxpayers; enable 3-D printing of firearms; and allows weapons of war to more easily spread around the world.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-5n9x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3119

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Helen Callison

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## General Comment

The changes that are proposed here will make it easier to transfer highly lethal weapons into the hands of people who may use them against defenseless civilians worldwide as well as, ultimately, against the United States and its citizens. It appears to have been written for the benefit and enrichment of manufacturers of arms, not for the benefit of the American people. Please reject these proposed changes.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-dixo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3120

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maria Palmer

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-85di Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3121

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anita Sutton

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-m2eg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3122

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carson Lommers

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-7i08 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3123

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Matsumoto

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I am a retired teacher who had to go through numerous lock-down drills with my students. How horrible that students and teachers now must be afraid for their safety due to the accessibility of firearms. This never occurred when I was a child, nor when my children were young. It started in the mid-90's and it has only grown worse. It is appalling.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-ggno Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3124

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Laughlin

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## General Comment

I absolutely oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-kzi4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3125

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cecil Prescod

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. This is a bad change that will make dangerous weapons more available.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-hlo4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3126

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am an individual who happens to work for a USML I firearms manufacturer, & am one of the principal members of its Compliance Department. I am not authorized to speak on behalf of my company, but will comment as an individual who has had "direct contact" with the ITAR, 7 days a week for the past 6 years.

In the years that I have interfaced with the firearms licensing unit of the DDTC for my applications, I have had relatively few problems and have been witness to some amendments which have resulted in positive changes. In terms of the everyday reality of working within this system, the ability to track the status of licenses in ELISA and if need be communicate directly with the licensing agent assigned to the application has been a productive process. I have also learned a great deal from working with the personnel of the DDTC unit charged with handling Category I firearms and accessories applications. The unit has proven to be both knowledgeable and helpful in achieving my licensing goals. Other than the occasional EAR99 shipment, my involvement with the BIS regulations has been minimal and I have yet to utilize the SNAP-R system, so I cannot directly judge exactly what real improvements would result from this migration, if any. The devil you know is often preferable to the one you don't.

Given that the licensing process under this proposed migration from DDTC to Commerce will still involve inter-agency review and the same staffing out to DOD and State Dept. Agencies, I don't see a clear indication of improvement, especially not in terms of processing times. This change represents a shift from one entity receiving an application to another. (Yes, we will save a few thousand dollars in registration fees.) The metric cited of 43.8 minutes for a BIS application vs. 60 minutes for DDTC application and the extrapolations of that metric to conclude a result of major savings fails to capture the true cost of the existing process or any nuances of how the process actually works. It certainly does not address the substantial burden created by the proposed the data capture for AES filing which will be amended to include make, model, and serial number.

The migration of non and semi-automatic firearms from USML I to BIS 0A501 will also initially create a substantial burden in terms of time and money for reclassifying product, retraining personal and revising all the SOPs associated with our exporting processes. I am not seeing a demonstrated case of either paperwork reduction or person-hour savings. Complicating the AES process at the end of the exporting chain is going to increase burdens for companies and place more burden on an already overloaded CBP. I do see areas where relief could and should be granted. While the change from the fee-based registration

and licensing structure of State to the no-fee structure of Commerce, will provide much needed relief for smaller companies, I have to believe that simply changing the definition of a manufacturer by including a minimum size requirement for registration could easily produce the same result and reduce the number of small businesses which are currently being caught in the net of the existing manufacturing definition and its fees which they cannot easily afford.

Also, major improvement could be easily achieved by raising value of the exemption in 123.17(a) from \$100 to \$500. While the proposed changes within LVS do increase this amount, they then reduce it by shifting the definition of value from wholesale to selling price, thus giving with one hand while taking away with the other. Permitting the export of receivers and breech mechanisms could be achieved by simply amending the "Canadian Exemption" within the ITAR. Also helpful, would be an increase in wholesale value from \$500 to \$1000 for Canada. The proposed LVS change with its "selling price" definition is not genuine relief.

I appreciate the reduced controls on technical data and the elimination of the concept of defense services which would be achieved by the migration, but given that there has been relatively little substantive change in basic firearms technology over the decades, a simple amendment to or exemption from the existing controls for firearms technology within the ITAR could likely achieve the same result without having to totally move to a new process. (I have watched competitors place manuals online-which we believe to be in violation of ITAR regulations-without repercussion.) A change in this area would level the playing field and eliminate an unfair competitive advantage and also improve our ability to market and repair firearms. Likely this type of improvement could be achieved without a major overhaul of the entire system.

In conclusion, speaking as someone who deals with ITAR functionality, I am quite certain positive relief could be achieved by judicious and minimal amendment to what already exists as opposed to a major overhaul which is certain to create a messy transition.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-wkfv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3127

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lesly Sanocki

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This is important do not make this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-xl0i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3128

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bonnie Tomski

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-42wq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3129

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ian Roozrokh

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946o-44mo
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3130

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maria Watson

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-2whj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3131

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Menendez

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## General Comment

We support the Export Control Reform Initiative reforms that have been implemented to date. These changes have rationalized and streamlined a cumbersome and opaque U.S. Munitions List (USML) in ways that make it more useful for American exporters and make non-militarily-sensitive exports easier to process and more competitive internationally.

However, the Department of State has published draft regulations that would remove small arms, light weapons, and associated equipment and ammunition from Categories I, II, and III of the International Trafficking in Arms Regulations, to be subject instead to the Commerce Control List (CCL) of the Department of Commerce. This will result in less rigorous oversight of the export of these deadly weapons.

Small arms and associated ammunition are uniquely lethal; they are easily spread and easily modified, and are the primary means of injury, death, and destruction in civil and military conflicts throughout the world. As such, they should be subject to more not less rigorous export controls and oversight. We strongly oppose any changes to Categories I, II, and III that do not adequately reflect the life-and-death impact such changes will have, including by maintaining congressional oversight over these sales before export. Specifically, combat rifles, including those commonly known as sniper rifles should not be removed from the USML, nor should rifles of any type that are U.S. military-standard 5.56 (and especially .50) caliber. Semi-automatic firearms should also not be removed, and neither should related equipment or ammunition or associated manufacturing equipment, technology, or technical data.

The Arms Export Control Act (AECA) enables congressional review of exports of these articles to ensure that they comport with U.S. foreign policy goals and values. Congress took action in 2002 to ensure that the sale and export of these weapons would receive close scrutiny and oversight, including by amending the AECA to set a lower reporting threshold (from \$14 million to \$1 million) specifically for firearms on the USML. Moving such firearms from the USML to the CCL, as is being proposed, would be directly contrary to congressional intent, made clear in 2002, and would effectively eliminate congressional oversight of exports of these weapons.

Congressional oversight has proven important on multiple occasions. Over the last several years, the Executive branch has considered and proposed sales to countries and foreign entities that have engaged in human rights abuses and atrocities. In May 2017, for example, the Administration sought to sell semi-automatic pistols to the bodyguard unit of President Erdogan of Turkey, despite the fact that members of that unit had viciously attacked peaceful protestors near the Turkish Embassy in Washington, DC. The sale was only halted because congressional notification was required by law. In addition to the proposed Turkey sale, State proposed the export of 27,000 automatic rifles to the Philippine National Police in August 2016, some members of which have been credibly alleged to have committed extrajudicial killings as part of President Duterte's so-called war on drugs, which has targeted mostly low-level drug users.

The Departments of State and Commerce have noted that State will still review the sales for human rights concerns if licensing is moved to the CCL. However, as demonstrated by the above examples, State has at times fallen short of its responsibility to prioritize such concerns in its consideration of such sales. Therefore, while we oppose this transfer of licensing authority to the Department of Commerce, we will also seek to ensure that congressional oversight is maintained if the proposal is implemented.

SEN. ROBERT MENENDEZ

Ranking Member, Committee on Foreign Relations, U.S. Senate

BENJAMIN L. CARDIN

United States Senator

DIANNE FEINSTEIN

United States Senator

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-ox14 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3132

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Annette Martinez

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## General Comment

Transferring the regulation of exporting firearms to the Commerce Department makes the sale of firearms about money rather than safety. History has shown time and again that US exported firearms will be used against US citizens here and abroad.

Here are some of the many reasons rational people are opposed to this change:

- \*Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- \*Reduces or eliminates end-use controls, such as State Dept's Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- \*Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- \*Eliminates Congressional oversight for important gun export deals.
- \*Removes statutory license requirements for brokers, increasing risk of trafficking.
- \*Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- \*The Commerce Department does not have the resources to enforce export controls.
- \*Reduces transparency and reporting on gun exports.
- \*Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The State Department is the appropriate agency to regulate the exporting of firearms. The Commerce Department is not.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-xvyb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3133

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Spectra Myers

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## General Comment

Definitely do not want regulations weakened. All these gun sales are destabilizing other countries and sending refugees to our borders. We have to be very careful about any gun sales.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-cbrh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3134

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kris VanLith

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-n283 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3135

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Betty Brickson

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## General Comment

Please do NOT transfer export license oversight for firearms from the State Department to the Commerce Department. This move only serves to benefit the gun industry and harm innocent people - including women and children - throughout the world. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-wtxm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3136

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Myres

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## General Comment

Greetings from Cincinnati, Ohio

I am James A. Myres, I served in the U.S. Coast Guard (1966-70), I am currently 73 years old and I am a Franciscan. I can not understand how you can consider transferring control of the export of firearms to the Department of Commerce's Bureau of Industry and Security. This will directly put members of the U.S. military in harms way and will put U.S. citizens traveling abroad in harms way. Our own gun manufacturers will be killing U.S. citizens.

Firearms are used to kill a thousand people every day around the world, this policy will just make it easier for the "bad guys" to get their hands on weapons that rival what our military uses. This may create hundreds of jobs but at what cost?

Military firearms are specifically useful in acts of organized crime, political violence, terrorism, and human rights violations. We can certainly supply these weapons but is it the right thing to do? I personally do not think it is. We would be better off as individuals and as a country supporting the middle class in third world countries, not corrupt ruling classes or lawless gangs operating in the name of the governments.

The types of weapons being transferred to Commerce control, including military-style assault rifles and their ammunition, these are weapons of choice for criminal organizations in Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. These weapons and the violence they bring are driving our immigration crisis.

The export of these weapons should be subject to more controls, not less.

Peace

Jim Myres, OFS  
1745 Eastwind Ct.  
Cincinnati, Ohio 45230

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-yyyk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3137

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jackie Spisak

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-si4z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3138

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debra Martin

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-fyes Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3139

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hannah Friedman

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## General Comment

I am against the proposed rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally. This rule would basically be helping to arm those who want to do Americans harm; exported guns and ammunition will almost certainly fall into the hands of terrorist groups, criminal organizations, human rights abusers, and other dangerous groups. Given world events, how can we even consider shipping more arms abroad? The profit gains for American gun and ammunition manufacturers is simply not worth the risk.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-4zrv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3140

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Waldron

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-jvpn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3141

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Looks like Teapot Dome all over again, just with international flavor. Shame!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-sgzd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3142

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Aislyn Matias

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This change in oversight is yet another example of politicians acting as neocapitalists. Enough amoral, irrational, and inhumane decision-making that doesn't represent an actual constituency!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-9sbp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3143

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vergena Copeland

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-gzn9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3144

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeremy Anonymous

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## General Comment

Its morally abhorrent to keep out immigrants seeking a safer life in the US while creating policies to make it easier for dangerous criminals in other countries to get guns and terrorize the people who only want to be safe. This proposed rule is shameful and I ask that it not be implemented.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-or3u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3145

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christine Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-2hsl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3146

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ashley Margulis

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-9f7k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3147

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-b2ok Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3148

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Beier

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-rrkr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3149

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Dennis

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## General Comment

I oppose moving export license oversight for firearms from the state dept. to the commerce dept. The proposed rule change eliminates important congressional oversight for gun export deals and allows weapons of war to proliferate on the open market among other things. Now more than ever we need sensible gun legislation; it should be about morality and safety. Not profit.

Sincerely,

Carol Dennis



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-sbqt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3150

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Cortelyou

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## General Comment

It is dangerous and foolhardy to treat weapons as simple commodities to be sold on the open market. Do we really want to arm any faction that can pay? This proposal is based rooted in greed and eliminates sound policy assessment. While 3D printing of firearms may not be preventable in the long run, it is wantonly careless to enable it. Nothing in this proposed rule change reflects sound judgement.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-9fl5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3151

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Gatwood

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## General Comment

I object to the proposed rule change. I believe the types of firearms exports currently under the control of the U.S. Department of State should remain so, because if the new rule were to take effect, Congress would no longer be automatically informed of the exports of large amounts of weaponry to foreign countries even foreign countries with horrendous human rights records.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-hdms Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3152

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Wilder

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit the retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively

condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-v4fs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3153

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-18lx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3154

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Fran Carroll

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## General Comment

I am opposed to loosening regulations related to the export of firearms. This is so dangerous, who could be for this, except those who are in the gun manufacturing industry and others who stand to make money from it? Given our national security concerns and in this age of international terrorism, loosening regulations on the export and sale of firearms is just about the worst thing we could do. This measure could potentially increase the chance of dangerous weapons ending up in the hands of international criminals. I do not think this proposal adequately addresses our interests with regards to national security, foreign policy, international crime and terrorist threats. The administration should NOT move forward with this reckless proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-w3od Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3155

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Hohlt

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## General Comment

I am writing to oppose the proposed rule that would shift the responsibility of monitoring exports and import of firearms and ammunition from the State Department to the Department of Commerce. The shift would change a lot of current programs and make it far easier for weapons to be exported and divert to areas of conflict throughout the world. The State Department has a mission to reduce arms trafficking and promote peace and has successfully been doing this for years. The Commerce Department is by its name interested in increasing commerce. That is important but not in the area of providing more firearms, including semi-automatic weapons, to countries where they can be easily diverted into areas of conflict.

For instance, taking this monitoring out of the State Department would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. And It would remove licensing requirements for brokers, increasing the risk of trafficking.

It might also have an adverse effect on controlling the 3D printing of firearms. Why would we want to make it easier for gun traffickers and terrorist to get weapons. For the safety of our armed forces and our citizens we should keep the monitoring of exports/imports and of weapons brokers in the Department of State.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-q01q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3156

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Brownrigg

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world.

The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-fw2w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3157

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angie Voss

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## General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-tojb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3158

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurajean Kudatzky

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-snub Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3159

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Heidi Zollo

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would allow firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

The State Departments Blue Lantern program would be eliminated, which has been in effect since 1940. The Blue Lantern programs carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. If Commerce were responsible for exporting of firearms, then public would likely not know any information about these firearms -- what firearms are going to which countries, regimes, etc. Licencing requirements would be removed for brokers increasing the risk of trafficking -- again what firearms to which countries/regimes.

Another issue is that 3D printing of firearms would be allowed, enabling 3D printing of firearms in the US and around the world.

If firearms regulations remain with the State Department, then Congress can oversee their sales, block sales of large batches of firearms to foreign countries. Congress would not be automatically informed about weapons sales, could not stop exports for national security concerns or to countries where there are serious human rights concerns.

The world would be a more dangerous place if Commerce were to have oversight of firearm exports.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-nnh1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3160

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura sauter

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-kwv1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3161

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Leon

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## General Comment

The department of commerce should never have control over the exporting of weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-f9jv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3162

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean Brodahl

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## General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world.

The rule change increases the profits to the American gun industry while the entire world pays the cost in lives!

If this is enacted, America's reputation will be further tainted from spreading violence. Please do not move this oversight from the State Department.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-90wn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3163

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Constance McConnell

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This is important!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-1f3i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3164

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann Grover

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## General Comment

I oppose transferring regulation of firearms exports from the State Dept to the Commerce Dept. The political and humanitarian consequences of arms sales are far too grave to not subject these sales to foreign policy review. The free market is designed to be impervious to these important considerations, and is therefore inadequate to protect US interests.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-7nuk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3165

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Thompson

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## General Comment

I am against this rule. It would make the U.S. and the world a more dangerous place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-nvd2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3166

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please do not do this/ let this pass. Weapons are already getting into the hands of people who are falling through the cracks of the current laws in place. and should not be in possession of guns..This will just exacerbate that problem. PLEASE, no more senseless loss if human life!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-arvj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3167

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** P S

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## General Comment

I oppose the transfer of oversight of firearms export from the state to commerce department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-9jqf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3168

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Wall

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## General Comment

Firearms are a matter of security not of commerce. Let the state department handle matters of security and the sales of firearms rather than transferring that oversight to commerce.

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-uusc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3169

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Yolanda Lawas

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-8dqs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3170

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Martinelli

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-5b4j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3171

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mildred Sieber

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## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake-- including the lives of our children in the Armed Forces!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-lwa6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3172

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amy Lev

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## General Comment

Arming the world is not conducive to peaceful resolution of ANYTHING.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-2p54 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3173

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roberta Cade

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## General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ylmj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3174

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** P G

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## General Comment

I  
On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ujl1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3175

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roberta Dobbins

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## General Comment

I strenuously object to transferring regulation of firearms exports to the Department of Commerce. The State Department is best equipped to handle this role. It is vitally important for Congress to restrict sales of firearms to oppressive regimes, terrorists and crime organizations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-wtqh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3176

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Infante

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## General Comment

For the following reasons I strongly protest the following provisions of The U.S. Department of State (DOS) Proposed Rule: International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III : This proposal

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ye2f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3177

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brendan Jordan

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-y7sd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3178

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Andrea Doorack

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## General Comment

I object to the proposed changes in the International Traffic in Arms Regulations: U.S. Munitions List, Categories I, II, and III because I believe it will be more dangerous for our troops, U.S. Border Patrol and our Coast Guard. I want to know what the Defense Department thinks of taking regulation of these currently tightly restricted weapons sales and licensing of dealers away from the State Department and transferring this responsibility to the Commerce Department whose main goal is to making it easier to trade in these lethal weapons. For example, we now have troops in every country in Africa. We are fighting nonstate groups, paramilitary forces, terrorist organizations, and individuals waging war on the citizens and government security forces in Africa now. In Mexico, Central and Latin America, refugees are fleeing violence and terror from rich and powerful Narco groups and corrupt police and ineffectual governments. What do our neighbor countries and allies think of the changes will put more weapons into the hands of thugs and despots internationally? Permanent wars are profitable for arms dealers. I now understand what was at stake in keeping assault rifles and high capacity magazines available for sale in the U.S. Domestic market.. they can now be classified as nonmilitary and trafficked internationally. That is the payback for the \$30,000,000 investment in the 2016 election. I do not agree that profits for arms dealers supersede the security of our own children, citizens and security forces. I will continue to stand up for the lives of my grandchildren and to build a better future for them as citizens of this country and the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-fhig Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3179

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joel VanderHoek

**Organization:** BORDERVIEW International Firearm Logistics

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## General Comment

BORDERVIEW appreciates the opportunity to comment on the long-awaited transition of firearms and related items from the jurisdiction of the Department of State to the Department of Commerce. We have closely followed the efforts since the early days of the Obama administration to complete this phase of Export Control Reform, and applaud the publishing of these proposed rules.

Broadly speaking, we are very supportive of the proposal and would like to underscore the well-laid justifications made in your proposed rule, and the companion Department of Commerce proposed rule, in addition to the 'Myths vs. Facts' release posted on your website. BORDERVIEW looks forward to your publishing of the Final Rule and completion of these longstanding and bipartisan efforts to simplify our nation's export control infrastructure to better control the most military-sensitive items, while maintaining appropriate controls on Dual Use items such as firearms.

We submitted a detailed comment letter to the U.S. Department of Commerce as their proposed rules would cover a supermajority of our sporting firearm export activity going forward. Nonetheless, we offer here our affirmation of the broad transition affected by these companion rules. Furthermore, we encourage a split effective date where a delayed effective date of 180 days is given so larger companies can align IT systems, etc, and an immediate effective date is allowed for smaller companies or those prepared to make the immediate shift to the EAR. This would directly impact smaller companies and especially those non-exporting companies such as gunsmiths required to register under the ITAR, who may be facing costly renewals during an extended delayed effective period. While not standard practice, there is precedent in the July 2014 notice of FR 79 37535, which gave two effective dates for that Final Rule.

Regardless of the effective date published in the Final Rule, we respectfully request that DDTC and BIS complete their review of comments and publish a Final Rule as soon as is reasonably possible. Given the long-awaited nature of these rules, prompt publishing of the Final Rule after appropriate review and consideration of all relevant comments by impacted parties would be greatly appreciated and beneficial to both industry and government.

The justification provided is clear and absolutely sensible. This is not a de-controlling as some are wrongly asserting. Regardless of recent politicization by some in Congress and the media, this has truly been an historic bipartisan effort over many years, starting in the earliest days of the Obama administration and now coming to fruition under the current administration.

Thank you for your consideration and we look forward to review of the final rule.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-8wqc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3180

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sue Grele

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## General Comment

I strongly urge the State Department to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing one thousand people around the world every day, we certainly should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-4ry1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3181

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara MacAlpine

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## General Comment

I oppose this proposed rule that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Moving the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ark9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-3182

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Heather Estrella

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## General Comment

Dear U.S. Department of State,

I am a U.S. Citizen and oppose the transfer of gun exports to the Commerce Department.

This transfers the cost of license processing to taxpayers and removes statutory license requirements for brokers, increasing The risk of trafficking and decreasing the tracking of mass weapon accumulation.

This reduces or eliminates end-use controls, such as State Department's Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since 1940's.

This says semi-automatic weapons are not military weapons yet these are the weapons used by military around the world and are used in massive world conflicts that harm millions of people.

The Commerce Department does not have the resources nor expertise to enforce export controls, even now. They will not be able to enforce tracking necessary for mass weapon sales.

This reduces the transparency and reporting on gun exports.

This transfers gun export licensing from agency with a mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade and profit.

This is not a move in the best interest of U.S. safety and citizens. It is in the interest of gun manufacturers whose mission is to boost sales at the risk of lives and stability.

Message

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**From:** Heidema, Sarah J [HeidemaSJ@state.gov]  
**Sent:** 1/2/2020 3:41:20 PM  
**To:** PM-Staffers Mailbox [PM-StaffersMailbox@state.gov]  
**CC:** Hart, Robert L [HartRL@state.gov]; Paul, Joshua M [PaulJM@state.gov]; Miller, Michael F [MillerMF@state.gov]; Khawam, Joseph N [KhawamJN@state.gov]  
**Subject:** A/M to S: Cats I-III  
**Attachments:** Tab 1 - FRN Revised USML Categories I II and III Full Text - 12 19 2019 (Pompeo).docx; Tab 2 - Commerce Draft Final Rule.pdf; Tab 4 - Background on Major vs Non Major Rules.pdf; Tab 5 - February 2019 Senator Menendez Letter.pdf; Tab 6 - December 2019 Senator Menendez Letter.pdf; AM for S - USML Cat I-III Final FRN v9 010220.docx; Tab 3 - Overview of State Department's Efforts to Revise USML Categories I II and III (final) (003) 010220.docx

Staffers-

Please find attached and A/M to S for revisions to the USML. I have attached here all of the attachments to the A/M. Mel has been working with L on the best way to get the extremely long attachments to Tab 3 into the system, so I will defer to them on that.

Sarah Heidema  
Director  
Office of Defense Trade Controls Policy  
Directorate of Defense Trade Controls  
Department of State  
202-663-2809

SENSITIVE BUT UNCLASSIFIED

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## United States Senate

COMMITTEE ON FOREIGN RELATIONS

WASHINGTON, DC 20510-6225

February 22, 2019

The Honorable Mike Pompeo  
 Secretary of State  
 U.S. Department of State  
 2201 C Street, N.W.  
 Washington, D.C. 20520

Dear Secretary Pompeo:

On February 4, 2019, I received a congressional notification from the Department for a proposal to transfer responsibility for the export control of firearms and ammunition from the United States Munitions list (USML) to the Commerce Control List (CCL). I write to inform you that I am placing a hold on the congressional notification, pursuant to the authority of Section 38(f) of the Arms Export Control Act (AECA).

I am deeply concerned about this proposed transfer. As you no doubt are aware, firearms and ammunition – especially those derived from military models and widely used by military and security services – are uniquely dangerous. They are easily modified, diverted, and proliferated, and are the primary means of injury, death, and destruction in civil and military conflicts throughout the world. As such, they should be subject to more, not less, rigorous export controls and oversight.

Combat rifles, including those commonly known as “sniper rifles,” should not be removed from the USML, nor should rifles of any type that are U.S. military-standard 5.56 (and especially .50 caliber). Semi-automatic firearms should also not be removed, and neither should related equipment, ammunition, or associated manufacturing equipment, technology, or technical data.

Consequently, my hold will remain in place until such time as the issues identified below are sufficiently addressed.

### 1) Removal of Firearms Exports from Congressional Information and Review

The AECA enables congressional review of exports of lethal weapons to ensure that they comport with U.S. foreign policy interests. Congress took action in 2002 to ensure that the sale and export of these weapons would receive stringent oversight, including by amending the AECA to set a lower reporting threshold (from \$14 million to \$1 million) specifically for firearms on the USML. Moving such firearms from the USML to the CCL would directly

contradict congressional intent and effectively eliminate congressional oversight and potential disapproval of exports of these weapons. Congressional oversight must be retained.

## 2) Proliferation of 3D Gun Printing Technical Information

There is a serious risk that this transfer will open the floodgates of information for the 3D printing of nearly-undetectable firearms and components by foreign persons and terrorists that intend to harm U.S. citizens and interests. The Department of Commerce claims that it cannot, by its own regulations, prevent the publication, including on the Internet for global consumption, of technical information and blueprint files that would enable this 3D production, if such information has once been published, even illegally. This is outrageous and simply unacceptable given the dangers it poses to U.S. citizens and interests.

Moreover, it may also be at variance with recent law. Section 1758 of the Export Control Reform Act of 2018 authorizes the Secretary of Commerce to control “emerging and foundational technologies” that (A) are essential to the national security of the United States; and (B) are not critical technologies described in clauses (i) through (v) of section 721(a)(6)(A) of the Defense Production Act of 1950. 3D printing has been identified by this Administration as an emerging technology of concern, and the Department of Commerce itself used 3D printing as an example of “emerging technology” in its November 19, 2018 Federal Register notice seeking public comment on what constitutes emerging technologies pursuant to this new statutory charge. Then-Secretary of Defense Mattis twice mentioned the challenges of 3D printing in congressional testimony, and Director of National Intelligence Coats, in his 2018 Worldwide Threat Assessment of the U.S. Intelligence Community, stated that, “[a]dvances in manufacturing, particularly the development of 3D printing, almost certainly will become even more accessible to a variety of state and non-state actors and be used in ways contrary to our interests.”

It would seem axiomatic that the capability to 3D-print lethal weaponry that cannot easily or reliably be detected by metal detectors at airports, schools, governmental or other facilities (including the U.S. Capitol and the Department of State) would qualify as an emerging technology in need of regulatory control. Yet, the Commerce Department has told my staff that the interagency process to identify emerging and foundational technologies to be controlled has not been completed, and is unlikely to be completed for months. By proceeding with the transfer of firearms, including 3D printing technical information, to Commerce, the Administration is acting recklessly and endangering innocent lives. It should go without saying that we collectively need to understand the threat and have a plan to address this issue before making the regulatory change.

Moreover, the Department of Commerce would seem to have adequate additional regulatory authority to control 3D gun printing information, at least temporarily. Commerce can control any item for foreign policy reasons under the miscellaneous category of 0Y521, according to a final rule issued by Commerce in 2012. Preventing foreign terrorists and thugs from acquiring

the means to print undetectable guns to use against U.S. citizens is a sufficient foreign policy justification to control this technology from public release.

Ultimately, the specific provision of the Export Administration Regulations is cited as preventing Commerce from controlling the publication of 3D Printed guns in the longer term needs to be rewritten to permit this control. Until that occurs, or until Commerce determines that such technical information can and will be controlled, this technical information cannot and should not be transferred from USML to the CCL.

I look forward to your prompt response to my concerns.

Sincerely,

A handwritten signature in black ink, reading "Robert Menendez". The signature is fluid and cursive, with a large, stylized "R" and "M".

Robert Menendez  
Ranking Member

CC: The Honorable Wilbur Ross, U.S. Secretary of Commerce



JAMES E. RUSCH, IDAHO, CHAIRMAN

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 TIM Kaine, VIRGINIA  
 EDWARD J. MARKEY, MASSACHUSETTS  
 JEFF MERKLEY, OREGON  
 CORY A. BOOKER, NEW JERSEY

## United States Senate

COMMITTEE ON FOREIGN RELATIONS

WASHINGTON, DC 20510-6225

December 10, 2019

The Honorable Mike Pompeo  
 Secretary of State  
 U.S. Department of State  
 2201 C Street, N.W.  
 Washington, D.C.

Dear Secretary Pompeo:

On February 4, 2019, I received congressional notification from the Department, pursuant to the authority of section 38(f) of the Arms Export Control Act (AECA), for the proposed transfer of responsibility for the export control of firearms and ammunition from the United States Munitions list (USML) to the Commerce Control List (CCL). I wrote to inform you on February 22 that I was placing a hold on that congressional notification. On November 12, 2019, the Department submitted a new 38(f) notification in response to a proposed regulatory change by the Department of Commerce. I write to inform you that I am placing a hold on the November 12, 2019 notification for the reasons detailed below.

As you no doubt are aware, firearms and ammunition – especially those derived from military models and widely in-use by military and security services - are uniquely dangerous. They are easily modified, diverted, and proliferated, and are the primary means of injury, death, and destruction in civil and military conflicts throughout the world. As such, they should be subject to more rigorous export controls and oversight, not less.

Combat rifles, including those commonly known as “sniper rifles,” should not be removed from the USML, nor should rifles of any type that are U.S. military-standard 5.56 (and especially .50 caliber). Semi-automatic firearms should also not be removed, and neither should related equipment, ammunition, or associated manufacturing equipment, technology, or technical data.

My hold will remain in place until such time as the issue identified below is sufficiently addressed.

### 1) Removal of Firearms Exports from Congressional Information and Review

The AECA provides for congressional review of exports of lethal weapons to ensure that they comport with U.S. foreign policy interests. As you know, Congress took action in 2002 to ensure that the sale and export of these weapons would receive closer scrutiny and oversight, including by amending the AECA to set a lower congressional reporting threshold (from \$14 million to \$1 million) specifically for firearms on the USML. Moving such firearms from the USML to the CCL would effectively eliminate congressional oversight of exports of these weapons by eliminating this congressional reporting requirement, and would be directly contrary to congressional intent.



To that end, I reiterate my demand from my previous letter: the Senate Foreign Relations and House Foreign Affairs committees must be immediately informed of any proposed license to export firearms formerly controlled on the USML at the appropriate dollar threshold mandated in the Arms Export Control Act. This concern must be satisfactorily addressed before I will lift my hold.

2) Proliferation of 3D Gun Printing Technical Information

In my February letter, I expressed that there is a serious risk that this transfer will open the floodgates of information for the 3D printing of nearly-undetectable firearms and components by foreign persons and terrorists that intend to harm U.S. citizens and interests. The Department of Commerce claimed that it could not, by its own regulations, prevent the publication, including on the Internet for global consumption, of technical information and blueprint files that would enable this 3D production, if such information has once been published, even illegally. I wrote that:

*Ultimately, the specific provision of the Export Administration Regulations that is cited as preventing Commerce from controlling the publication of 3D Printed guns in the longer term needs to be rewritten to permit this control. Until that occurs, or until Commerce determines that such technical information can and will be controlled, this technical information cannot and should not be transferred from USML to the CCL.*

I understand that the Department of Commerce has now decided to alter its regulations to address this concern; technical information related to the manufacture of firearms, to include 3D-printing information, proposed for transfer to the CCL will be prohibited from publication or Internet posting without a license. That does seek to address my previously-expressed concern, and I will not insist on this to lift my hold. However, I note that this improvement could easily be undone through a simple regulatory change in the future that would not even require congressional notification or review; a statutory authority to maintain such licensing, or better yet, an outright prohibition, may be required. Moreover, Commerce must maintain a policy of "presumption of denial" for any license application sought to publish or post such information, and pursue any violations vigorously.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Menendez". The signature is fluid and cursive, with a large, stylized "R" and "M".

Robert Menendez  
Ranking Member

Message

**From:** Khawam, Joseph N [KhawamJN@state.gov]  
**Sent:** 1/2/2020 3:47:52 PM  
**To:** PM-Staffers Mailbox [PM-StaffersMailbox@state.gov]; Heidema, Sarah J [HeidemaSJ@state.gov]  
**CC:** Hart, Robert L [HartRL@state.gov]; Paul, Joshua M [PaulJM@state.gov]; Miller, Michael F [MillerMF@state.gov]; Windecker, Melissa A [WindeckerMA@state.gov]  
**Subject:** RE: A/M to S: Cats I-III

Thanks, Ashley. I can send them now.

Joseph N. Khawam  
Office of the Legal Adviser (L/PM)

SENSITIVE BUT UNCLASSIFIED

**From:** PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>  
**Sent:** Thursday, January 2, 2020 10:47 AM  
**To:** Heidema, Sarah J <HeidemaSJ@state.gov>  
**Cc:** Hart, Robert L <HartRL@state.gov>; Paul, Joshua M <PaulJM@state.gov>; Miller, Michael F <MillerMF@state.gov>; Khawam, Joseph N <KhawamJN@state.gov>; PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>; Windecker, Melissa A <WindeckerMA@state.gov>  
**Subject:** RE: A/M to S: Cats I-III

Hi Sarah,

L sent the docs for attachment 5 and 7 of Tab 3, but not the others.

Can someone please send?

Thanks,  
Ashley

SENSITIVE BUT UNCLASSIFIED

**From:** Heidema, Sarah J <HeidemaSJ@state.gov>  
**Sent:** Thursday, January 2, 2020 10:41 AM  
**To:** PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>  
**Cc:** Hart, Robert L <HartRL@state.gov>; Paul, Joshua M <PaulJM@state.gov>; Miller, Michael F <MillerMF@state.gov>; Khawam, Joseph N <KhawamJN@state.gov>  
**Subject:** A/M to S: Cats I-III

Staffers-

Please find attached and A/M to S for revisions to the USML. I have attached here all of the attachments to the A/M. Mel has been working with L on the best way to get the extremely long attachments to Tab 3 into the system, so I will defer to them on that.

Sarah Heidema  
Director  
Office of Defense Trade Controls Policy  
Directorate of Defense Trade Controls  
Department of State  
202-663-2809

SENSITIVE BUT UNCLASSIFIED

## Message

**From:** Khawam, Joseph N [KhawamJN@state.gov]  
**Sent:** 1/2/2020 4:25:35 PM  
**To:** Kovar, Jeffrey D [KovarJD@state.gov]  
**CC:** Minarich, Christine M [MinarichCM@state.gov]; Jones, Elisabeth B [JonesEB@state.gov]  
**Subject:** FW: A/M to S: Cats I-III  
**Attachments:** Tab 1 - FRN Revised USML Categories I II and III Full Text - 12 19 2019 (Pompeo).docx; Tab 2 - Commerce Draft Final Rule.pdf; Tab 4 - Background on Major vs Non Major Rules.pdf; Tab 5 - February 2019 Senator Menendez Letter.pdf; Tab 6 - December 2019 Senator Menendez Letter.pdf; AM for S - USML Cat I-III Final FRN v9 010220.docx; Tab 3 - Overview of State Department's Efforts to Revise USML Categories I II and III (final) (003) 010220.docx

Just FYI, this is the AM package that went to the PM/FO. DDTC had to condense the AM a little to get within the 2-page limit. [REDACTED] I'm working with PM/FO staffers to ensure all of the attachments are included in the package uploaded to Everest. Thanks.

Joseph N. Khawam  
 Office of the Legal Adviser (L/PM)

## SENSITIVE BUT UNCLASSIFIED

**From:** Heidema, Sarah J <HeidemaSJ@state.gov>  
**Sent:** Thursday, January 2, 2020 10:41 AM  
**To:** PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>  
**Cc:** Hart, Robert L <HartRL@state.gov>; Paul, Joshua M <PaulJM@state.gov>; Miller, Michael F <Millermf@state.gov>; Khawam, Joseph N <KhawamJN@state.gov>  
**Subject:** A/M to S: Cats I-III

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 Director  
 Office of Defense Trade Controls Policy  
 Directorate of Defense Trade Controls  
 Department of State  
 202-663-2809

## SENSITIVE BUT UNCLASSIFIED

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 CORY A. BOOKER, NEW JERSEY

# United States Senate

COMMITTEE ON FOREIGN RELATIONS

WASHINGTON, DC 20510-6225

February 22, 2019

The Honorable Mike Pompeo  
 Secretary of State  
 U.S. Department of State  
 2201 C Street, N.W.  
 Washington, D.C. 20520

Dear Secretary Pompeo:

On February 4, 2019, I received a congressional notification from the Department for a proposal to transfer responsibility for the export control of firearms and ammunition from the United States Munitions list (USML) to the Commerce Control List (CCL). I write to inform you that I am placing a hold on the congressional notification, pursuant to the authority of Section 38(f) of the Arms Export Control Act (AECA).

I am deeply concerned about this proposed transfer. As you no doubt are aware, firearms and ammunition – especially those derived from military models and widely used by military and security services – are uniquely dangerous. They are easily modified, diverted, and proliferated, and are the primary means of injury, death, and destruction in civil and military conflicts throughout the world. As such, they should be subject to more, not less, rigorous export controls and oversight.

Combat rifles, including those commonly known as “sniper rifles,” should not be removed from the USML, nor should rifles of any type that are U.S. military-standard 5.56 (and especially .50 caliber). Semi-automatic firearms should also not be removed, and neither should related equipment, ammunition, or associated manufacturing equipment, technology, or technical data.

Consequently, my hold will remain in place until such time as the issues identified below are sufficiently addressed.

## 1) Removal of Firearms Exports from Congressional Information and Review

The AECA enables congressional review of exports of lethal weapons to ensure that they comport with U.S. foreign policy interests. Congress took action in 2002 to ensure that the sale and export of these weapons would receive stringent oversight, including by amending the AECA to set a lower reporting threshold (from \$14 million to \$1 million) specifically for firearms on the USML. Moving such firearms from the USML to the CCL would directly

contradict congressional intent and effectively eliminate congressional oversight and potential disapproval of exports of these weapons. Congressional oversight must be retained.

## 2) Proliferation of 3D Gun Printing Technical Information

There is a serious risk that this transfer will open the floodgates of information for the 3D printing of nearly-undetectable firearms and components by foreign persons and terrorists that intend to harm U.S. citizens and interests. The Department of Commerce claims that it cannot, by its own regulations, prevent the publication, including on the Internet for global consumption, of technical information and blueprint files that would enable this 3D production, if such information has once been published, even illegally. This is outrageous and simply unacceptable given the dangers it poses to U.S. citizens and interests.

Moreover, it may also be at variance with recent law. Section 1758 of the Export Control Reform Act of 2018 authorizes the Secretary of Commerce to control “emerging and foundational technologies” that (A) are essential to the national security of the United States; and (B) are not critical technologies described in clauses (i) through (v) of section 721(a)(6)(A) of the Defense Production Act of 1950. 3D printing has been identified by this Administration as an emerging technology of concern, and the Department of Commerce itself used 3D printing as an example of “emerging technology” in its November 19, 2018 Federal Register notice seeking public comment on what constitutes emerging technologies pursuant to this new statutory charge. Then-Secretary of Defense Mattis twice mentioned the challenges of 3D printing in congressional testimony, and Director of National Intelligence Coats, in his 2018 Worldwide Threat Assessment of the U.S. Intelligence Community, stated that, “[a]dvances in manufacturing, particularly the development of 3D printing, almost certainly will become even more accessible to a variety of state and non-state actors and be used in ways contrary to our interests.”

It would seem axiomatic that the capability to 3D-print lethal weaponry that cannot easily or reliably be detected by metal detectors at airports, schools, governmental or other facilities (including the U.S. Capitol and the Department of State) would qualify as an emerging technology in need of regulatory control. Yet, the Commerce Department has told my staff that the interagency process to identify emerging and foundational technologies to be controlled has not been completed, and is unlikely to be completed for months. By proceeding with the transfer of firearms, including 3D printing technical information, to Commerce, the Administration is acting recklessly and endangering innocent lives. It should go without saying that we collectively need to understand the threat and have a plan to address this issue before making the regulatory change.

Moreover, the Department of Commerce would seem to have adequate additional regulatory authority to control 3D gun printing information, at least temporarily. Commerce can control any item for foreign policy reasons under the miscellaneous category of 0Y521, according to a final rule issued by Commerce in 2012. Preventing foreign terrorists and thugs from acquiring

the means to print undetectable guns to use against U.S. citizens is a sufficient foreign policy justification to control this technology from public release.

Ultimately, the specific provision of the Export Administration Regulations is cited as preventing Commerce from controlling the publication of 3D Printed guns in the longer term needs to be rewritten to permit this control. Until that occurs, or until Commerce determines that such technical information can and will be controlled, this technical information cannot and should not be transferred from USML to the CCL.

I look forward to your prompt response to my concerns.

Sincerely,

A handwritten signature in black ink, reading "Robert Menendez". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Robert Menendez  
Ranking Member

CC: The Honorable Wilbur Ross, U.S. Secretary of Commerce



JAMES E. RUSCH, IDAHO, CHAIRMAN

MARCO RUBIO, FLORIDA  
 RON JOHNSON, WISCONSIN  
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## United States Senate

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WASHINGTON, DC 20510-6225

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To that end, I reiterate my demand from my previous letter: the Senate Foreign Relations and House Foreign Affairs committees must be immediately informed of any proposed license to export firearms formerly controlled on the USML at the appropriate dollar threshold mandated in the Arms Export Control Act. This concern must be satisfactorily addressed before I will lift my hold.

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Sincerely,

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Robert Menendez  
Ranking Member

## Message

**From:** Khawam, Joseph N [KhawamJN@state.gov]  
**Sent:** 1/2/2020 5:52:01 PM  
**To:** Minarich, Christine M [MinarichCM@state.gov]  
**Subject:** FW: A/M to S: Cats I-III  
**Attachments:** Tab 3 Att 1 - CAT Policy Implementation Plan Fact Sheet and CAT Policy.pdf; Tab 3 Att 2 - National Security and Foreign Policy Analysis.docx; Tab 3 Att 3 - Department of State Proposed Rule.pdf; Tab 3 Att 4 - Department of Commerce Proposed Rule.pdf; Tab 3 Att 6 - Congressional Correspondence (Combined).pdf; Tab 3 Att 8a - January 2019 Informal Congressional Notification.msg; Tab 3 Att 8b - February 2019 Formal Congressional Notification.pdf; Tab 3 Att 9 - Representative Samples of Media, Civil Society, and Academia Publications.pdf; Tab 3 Att 10 - POTUS Tweet.pdf; Tab 3 Att 11 - SOCs for Small Group on CATS I-III (Sep-Oct 2019).pdf; Tab 3 Att 12 - DRAFT Roll-Out Plan and Fact Sheet.docx; Tab 3 Att 13 - Section 1050 of FY2020 House NDAA Bill.pdf; Tab 3 Att 14 - IM for S on Cats I-III.pdf; Tab 3 Att 15 - Congressional Notification AM for S (Nov 2019).pdf; Tab 3 Att 16 - November 2019 Congressional Notification.pdf; Tab 3 Att 17 - FY20 NDAA Conference Report.pdf; Tab 3 Att 18 - Defense Distributed Case Key Documents.pdf; Tab 3 Att 19 - Washington Case Key Documents.pdf; Tab 3 Att 20 - Readout of NGO Roundtable (12-12-19).docx

Joseph N. Khawam  
 Office of the Legal Adviser (L/PM)

SENSITIVE BUT UNCLASSIFIED

**From:** Khawam, Joseph N  
**Sent:** Thursday, January 2, 2020 10:59 AM  
**To:** PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>  
**Cc:** Windecker, Melissa A <WindeckerMA@state.gov>; Heidema, Sarah J <HeidemaSJ@state.gov>; Hart, Robert L <HartRL@state.gov>  
**Subject:** RE: A/M to S: Cats I-III

Here are all of the Attachments to Tab 3, minus Attachments 5 and 7. Please let me know if you have any problems with the documents. Thanks.

Joseph N. Khawam  
 Office of the Legal Adviser (L/PM)

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**Cc:** Hart, Robert L <HartRL@state.gov>; Paul, Joshua M <PaulJM@state.gov>; Miller, Michael F <MillerMF@state.gov>; Khawam, Joseph N <KhawamJN@state.gov>; PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>; Windecker, Melissa A <WindeckerMA@state.gov>  
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Thanks,  
Ashley

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**Cc:** Hart, Robert L <[HartRL@state.gov](mailto:HartRL@state.gov)>; Paul, Joshua M <[PaulJM@state.gov](mailto:PaulJM@state.gov)>; Miller, Michael F <[MillerMF@state.gov](mailto:MillerMF@state.gov)>;  
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Sarah Heidema  
Director  
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Directorate of Defense Trade Controls  
Department of State  
202-663-2809

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Travelers

★ ★ ★

# Conventional Arms Transfer (CAT) Policy Implementation Plan Update

FACT SHEET

OFFICE OF THE SPOKESPERSON

MAY 21, 2019

Share 

In July the Secretary of State submitted to the President the Implementation Plan requested as part of the Conventional Arms Transfer (CAT) Policy (NSPM-10). This plan supports the U.S. National Security Strategy through a whole-of-government approach to better align our conventional arms transfers with our national security and economic interests.

In developing the CAT Policy Implementation Plan, and in order to ensure that it is fully integrated the real-world challenges we face, the Administration collected inputs from Congress, American industry and the non-governmental community. We are grateful for their cooperation in this process.

The Plan accounts for the increasingly competitive environment described in the National Security Strategy, and seeks to modernize the U.S. Government's policies and processes regarding arms transfers. It establishes three Lines of Effort (LOE) to implement our CAT Policy goals. Each LOE is supported by a number of tasks that will be undertaken by the relevant U.S. Government agencies.

## Line of Effort 1 – Prioritize Strategic and Economic Competition

This LOE directly addresses the challenges of increasing strategic competition, and enables the U.S. Government to prioritize allocation of its resources to overcome those challenges. It reorients the United States to a more proactive approach to arms transfers, and ensures these transfers reflect the priorities articulated in the National Security Strategy (NSS), the National Defense Strategy (NDS), the recent Report on Strengthening the Manufacturing and Defense Industrial Base and Supply Chain Resiliency of the United States that was mandated by Executive Order 13806, and other relevant strategic guidance.

Tasks within this line of effort include:

- ◆ **Effectively compete with strategic competitors** by providing allies and partners with alternatives to foreign defense articles in order to maintain U.S. influence in key regions;
- ◆ **Identify critical partner capability requirements** essential to achieving U.S. foreign policy and national security objectives;
- ◆ **Prioritize and expedite critical transfers** that reflect these partner capability requirements;
- ◆ **Identify and revise outdated arms transfer policies** that are legacies of past international security challenges; and
- ◆ **Develop holistic policies in support of arms transfers** by creating proactive, strategic policy guidance to prevent ad hoc decisions on individual transfers.

## Line of Effort 2 – Organize for Success

This LOE ensures that the Executive Branch is organized, staffed, and resourced to best support efficient execution of the conventional arms transfer policy, and that its processes are similarly aligned.

Tasks under this LOE include:

- ◆ **Streamline the International Traffic in Arms Regulations (ITAR)**, with the goal of reducing regulatory burdens for U.S. industry and barriers to the commercial defense trade;
- ◆ **Revise the United States Munitions List (USML)** to ensure that it clearly describes and adequately controls only those items that merit USML control;

- ◆ **Update the Commerce Control List (CCL)** to account for technological developments, practical application issues identified by exporters and re-exporters, and changes in the military and commercial non-military applications of controlled items;
- ◆ **Facilitate exports for certain U.S. and cooperative programs** so that the U.S. government has the needed flexibility to execute its mission;
- ◆ **Establish objective milestones and standard timelines for Foreign Military Sales (FMS)** to enable increased transparency, enhance the Defense acquisition system's ability to meet critical FMS milestones and timelines, and to assist industry planning for FMS case execution;
- ◆ **Increase the competitiveness of high-demand American weapons systems** by identifying and assessing challenges and developing potential solutions for those challenges;
- ◆ **Build exportability**, coalition interoperability, and configuration standardization into the Defense Department capability requirements development and approval processes;
- ◆ **Improve contracting for FMS** through innovative and pilot programs such as those made available in section 830(d) of the FY 2017 National Defense Authorization Act;
- ◆ **Enhance U.S. Government advocacy** so we can apply the full weight and influence of the United States in support of defense exports that are in our national interest;
- ◆ **Expand support for Non-Programs of Record** to broaden the scope of American defense offerings in order to better address partner demand;
- ◆ **Improve FMS Letter of Offer and Acceptance (LOA) processes and policies** so that U.S. offerings will be more responsive and competitive in foreign competitions;
- ◆ **Examine the U.S. Government policy on offsets** to ensure that it is relevant and effective in promoting American exports and protecting American technologies and jobs; and
- ◆ **Develop financing options** to support foreign partner procurements of U.S. defense articles.

### **Line of Effort 3 – Create Conducive Environments**

The intent of this line of effort is to ensure that Congressional, business, and international climates foster efficient operation of U.S. defense trade.



Tasks in this line of effort include:

- ◆ **Improve the FMS requirements development approach** to assist foreign partners in better identifying desired capabilities;
- ◆ **Reduce costs associated with FMS** such as surcharges and fees;
- ◆ **Improve the funding flexibility associated with FMS** to reduce prohibitive upfront costs for partners;
- ◆ **Request from Congress, where needed, legislative changes regarding contracting requirements for FMS**, in order to enhance the speed of the contracting processes and lower unit costs for U.S. military services;
- ◆ **Establish an Offset Task Force** to develop recommendations, in consultation with industry, on actions that could be taken to minimize the adverse impact of offsets in defense trade while not hindering the flexibility of U.S. industry as it competes in the global defense market;
- ◆ **Modernize the Missile Technology Control Regime** to reflect advances in technology while continuing to constrain the proliferation of systems that can deliver weapons of mass destruction;
- ◆ **Improve trade promotion** and expand U.S. Government engagement in support of American defense manufacturing; and
- ◆ **Work with U.S. industry to incentivize increased production capacity and timely delivery**, including by developing strong and stable market signals and by utilizing contracting approaches that reward faster delivery.

## Progress and the Way Ahead

The Administration is assessing progress on a quarterly basis, and revising the plan where needed. We continue to solicit input from industry, non-governmental organizations, and Congress to improve the arms transfer process, as well as feedback on the results of our efforts. To date, the Administration has made great progress in developing strategies to compete against strategic and economic rivals, has revised numerous policies to increase U.S. competitiveness, has reduced costs, is on track to streamline regulations and improve processes, among other accomplishments.

*For further information, please contact the Bureau of Political-Military Affairs, Office of Congressional*

<https://www.state.gov/conventional-arms-transfer-cat-policy-implementation-plan-update/>

and Public Affairs at [PM-CPA@state.gov](mailto:PM-CPA@state.gov), and follow the Bureau of Political-Military Affairs on Twitter, [@StateDeptPM](https://twitter.com/StateDeptPM).

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## TAGS

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PRESIDENTIAL MEMORANDA

# National Security Presidential Memorandum Regarding U.S. Conventional Arms Transfer Policy

— NATIONAL SECURITY & DEFENSE

Issued on: April 19, 2018

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MEMORANDUM FOR THE VICE PRESIDENT

THE SECRETARY OF STATE

THE SECRETARY OF THE TREASURY

THE SECRETARY OF DEFENSE

THE ATTORNEY GENERAL

THE SECRETARY OF COMMERCE

THE SECRETARY OF ENERGY

THE SECRETARY OF HOMELAND SECURITY

THE ASSISTANT TO THE PRESIDENT AND CHIEF OF STAFF

THE DIRECTOR OF THE OFFICE OF MANAGEMENT AND BUDGET

THE REPRESENTATIVE OF THE UNITED STATES OF AMERICA TO THE UNITED NATIONS

THE DIRECTOR OF NATIONAL INTELLIGENCE

THE DIRECTOR OF THE CENTRAL INTELLIGENCE AGENCY

THE ASSISTANT TO THE PRESIDENT FOR NATIONAL SECURITY AFFAIRS

THE ASSISTANT TO THE PRESIDENT AND COUNSEL TO THE PRESIDENT

THE ASSISTANT TO THE PRESIDENT FOR ECONOMIC POLICY AND DIRECTOR OF THE NATIONAL  
ECONOMIC COUNCIL

THE ASSISTANT TO THE PRESIDENT FOR HOMELAND SECURITY AND COUNTERTERRORISM

THE ASSISTANT TO THE PRESIDENT FOR TRADE AND INDUSTRIAL POLICY AND DIRECTOR OF THE  
OFFICE OF TRADE AND MANUFACTURING POLICY

THE ASSISTANT TO THE PRESIDENT FOR SCIENCE AND TECHNOLOGY AND DIRECTOR OF THE  
OFFICE OF SCIENCE AND TECHNOLOGY POLICY  
THE DIRECTOR OF NATIONAL DRUG CONTROL POLICY  
THE CHAIRMAN OF THE JOINT CHIEFS OF STAFF  
THE ADMINISTRATOR OF THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION  
THE DIRECTOR OF THE NATIONAL SECURITY AGENCY  
THE DIRECTOR OF THE DEFENSE INTELLIGENCE AGENCY  
THE DIRECTOR OF THE FEDERAL BUREAU OF INVESTIGATION

SUBJECT: United States Conventional Arms Transfer Policy

Section 1. Purpose. The security of the United States and the defense of our interests require a strong military, capable allies and partners, and a dynamic defense industrial base, which currently employs more than 1.7 million people. Strategic conventional arms transfers lie at the intersection of these interests and play a critical role in achieving our national, economic security, and foreign policy objectives.

This policy will be implemented consistent with requirements of the Arms Export Control Act of 1976, as amended (22 U.S.C. 2751 et seq.).

By better aligning our policy regarding conventional arms transfers with our national and economic security interests, the approach outlined in this memorandum will serve several functions. It will help us maintain a technological edge over potential adversaries; strengthen partnerships that preserve and extend our global influence; bolster our economy; spur research and development; enhance the ability of the defense industrial base to create jobs; increase our competitiveness in key markets; protect our ability to constrain global trade in arms that is destabilizing or that threatens our military, allies, or partners; and better equip our allies and partners to contribute to shared security objectives and to enhance global deterrence. These security objectives include countering terrorism, countering narcotics, promoting regional stability, and improving maritime and border security.

When a proposed transfer is in the national security interest, which includes our economic security, and in our foreign policy interest, the executive branch will advocate strongly on behalf of United States companies. The executive branch will also streamline procedures, clarify regulations,

increase contracting predictability and flexibility, and maximize the ability of the United States industry to grow and support allies and partners.

Sec. 2. Policy. With respect to arms transfers, it shall be the policy of the executive branch to:

- (a) bolster the security of the United States and our allies and partners, including by defending against external coercion, countering terrorism, and providing capabilities in support of shared security objectives;
- (b) maintain technological advantages of the United States military, including by ensuring that there are appropriate protections on the transfer of United States military technologies;
- (c) increase trade opportunities for United States companies, including by supporting United States industry with appropriate advocacy and trade promotion activities and by simplifying the United States regulatory environment;
- (d) strengthen the manufacturing and defense industrial base and lower unit costs for the United States and our allies and partners, including by improving financing options and increasing contract flexibility;
- (e) facilitate ally and partner efforts, through United States sales and security cooperation efforts, to reduce the risk of national or coalition operations causing civilian harm;
- (f) strengthen relationships and enhance military interoperability where doing so serves national security and foreign policy interests of the United States;
- (g) prevent proliferation by:
  - (i) exercising restraint in transfers that may be destabilizing, be dangerous to international peace and security, involve materials that may be used as delivery systems for weapons of mass destruction, or result in potential adversaries obtaining capabilities that could threaten the superiority of the United States military or our allies and partners;
  - (ii) continuing United States participation in and support for multilateral arrangements that contribute to the objectives and interests outlined in this memorandum, including the United

Nations Register of Conventional Arms, the United Nations Standardized Instrument for Reporting Military Expenditures, regional initiatives that enhance transparency in conventional arms transactions, the Missile Technology Control Regime (MTCR), and the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies;

(iii) continuing to use multilateral arrangements to promote shared national policies of restraint against the acquisition of armaments and sensitive dual-use goods and technologies for military end uses by states whose behavior is cause for serious concern; and

(iv) working bilaterally and multilaterally to assist other state suppliers of conventional arms in developing effective export control mechanisms in support of responsible export policies that align with those of the United States; and

(h) continue to meet the requirements of all applicable statutes, including the Arms Export Control Act, the Foreign Assistance Act, the International Emergency Economic Powers Act, and the annual National Defense Authorization Acts. Arms transfer decisions will be consistent with the requirements of all applicable export control regulations and international commitments and obligations of the United States. These laws and regulations will apply, as appropriate, regardless of whether transfers are accomplished through direct commercial sales, government-to-government transfers, United States assistance programs, approvals for the retransfer of arms, changes of end use, or upgrades.

Sec. 3. Arms Transfer Decisions. In making arms transfer decisions, the executive branch shall account for the following considerations:

(a) The National Security of the United States.

(i) The appropriateness of the transfer in responding to United States security interests.

(ii) The degree to which the transfer contributes to ally and partner burden-sharing and interoperability in support of strategic, foreign policy, and defense interests of the United States.

(iii) The transfer's consistency with United States interests in regional stability, especially when considering transfers that involve power projection, anti-access or area denial capability, or

the introduction of a capability that may increase regional tensions or contribute to an arms race.

(iv) The transfer's effect on the technological advantage of the United States, including the recipient's ability to protect sensitive technology; the risk of compromise to United States systems and operational capabilities; and the recipient's ability to prevent the diversion of sensitive technology to unauthorized end users.

(v) The recipient's nonproliferation and counterproliferation record.

(vi) The transfer's contribution to efforts to counter terrorism, narcotics trafficking, transnational organized crime, or similar threats to national security.

(b) The Economic Security of the United States and Innovation.

(i) The transfer's financial or economic effect on United States industry and its effect on the defense industrial base, including contributions to United States manufacturing and innovation.

(ii) The recipient's ability to obtain comparable systems from competing foreign suppliers.

(c) Relationships with Allies and Partners.

(i) The degree to which the transfer meets the objectives of bolstering the security and counterterrorism capabilities of our allies and partners and contributes to international peace and security.

(ii) The degree to which the transfer increases access and influence in ways that support our strategic, foreign policy, and defense interests.

(iii) The recipient's ability to field, support, and employ the requested system effectively and appropriately in accordance with its intended end use.

(iv) The likelihood of the transfer reducing ally and partner dependence on United States adversaries.

(v) The risk that the transfer will have adverse economic, political, or social effects within the recipient country.

(d) Human Rights and International Humanitarian Law.

(i) The risk that the transfer may be used to undermine international peace and security or contribute to abuses of human rights, including acts of gender-based violence and acts of violence against children, violations of international humanitarian law, terrorism, mass atrocities, or transnational organized crime.

(ii) Whether the United States has actual knowledge at the time of authorization that the transferred arms will be used to commit: genocide; crimes against humanity; grave breaches of the Geneva Conventions of 1949; serious violations of Common Article 3 of the Geneva Conventions of 1949; attacks intentionally directed against civilian objects or civilians who are legally protected from attack; or other war crimes as defined in section 2441 of title 18, United States Code. If the United States has such knowledge, the transfer shall not be authorized.

(e) Nonproliferation.

The risk that the transfer could undermine the integrity of international nonproliferation agreements and arrangements that prevent proliferators, programs, and entities of concern from acquiring missile technologies or other technologies that could substantially advance their ability to deliver weapons of mass destruction, or otherwise lead to a transfer to potential adversaries of a capability that could threaten the superiority of the United States military or our allies and partners.

Sec. 4. Implementation. (a) Within 60 days of the date of this memorandum, the Secretary of State, in coordination with the Secretaries of Defense, Commerce, and Energy, shall submit to the President, through the Assistant to the President for National Security Affairs (APNSA), a proposed action plan to implement the policy set forth in sections 2 and 3 of this memorandum.

(b) The proposed action plan shall include actions that the United States Government should take in the short term and long term to improve its ability to identify, communicate, pursue, and support arms transfers in the manner most beneficial to the national security interests of the United States, including economic security, the broader economy, and United States foreign policy interests. The



proposed action plan should account for the competitive environment in which the United States must operate and the need to protect and expand our technological advantages and our defense industrial base. The proposed action plan should include an outline of the financial and personnel resources necessary to implement the roadmap with minimal increase in the total of otherwise budgeted funds, with offsets identified if necessary.

(c) Within 60 days of the date of this memorandum, the Secretary of State, in coordination with the Secretaries of Defense, Commerce, and Energy, shall submit to the President, through the APNSA, a proposed initiative to align our unmanned aerial systems (UAS) export policy more closely with our national and economic security interests. The initiative should address the status of, and recommend next steps for, MTCR adoption of revised controls for MTCR Category I UAS, consistent with the UAS export policy.

Sec. 5. Earlier Presidential Actions. This memorandum supersedes and replaces Presidential Policy Directive-27 of January 15, 2014 (United States Conventional Arms Transfer Policy).

Sec. 6. General Provisions. (a) Nothing in this memorandum shall be construed to impair or otherwise affect:

- (i) the authority granted by law to an executive department or agency, or the head thereof; or
- (ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This memorandum shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This memorandum is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

DONALD J. TRUMP

## DEPARTMENT OF STATE

### 22 CFR Parts 121, 123, 124, 126, and 129

[Public Notice 10094]

RIN 1400-AE30

#### International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**AGENCY:** Department of State.

**ACTION:** Proposed rule.

**SUMMARY:** The Department of State (the Department) proposes to amend the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

**DATES:** The Department will accept comments on this proposed rule until July 9, 2018.

**ADDRESSES:** Interested parties may submit comments within 45 days of the date of publication by one of the following methods:

- *Email:* [DDTCTPublicComments@state.gov](mailto:DDTCTPublicComments@state.gov) with the subject line, "ITAR Amendment—Categories I, II, and III."
- *Internet:* At [www.regulations.gov](http://www.regulations.gov), search for this notice using Docket DOS-2017-0046.

Comments received after that date will be considered if feasible, but consideration cannot be assured. Those submitting comments should not include any personally identifying information they do not desire to be made public or information for which a claim of confidentiality is asserted, because those comments and/or transmittal emails will be made available for public inspection and copying after the close of the comment period via the Directorate of Defense Trade Controls website at [www.pmddtc.state.gov](http://www.pmddtc.state.gov). Parties who wish to comment anonymously may do so by submitting their comments via [www.regulations.gov](http://www.regulations.gov), leaving the fields that would identify the commenter blank and including no identifying information in the comment itself.

**FOR FURTHER INFORMATION CONTACT:** Robert Monjay, Office of Defense Trade Controls Policy, Department of State, telephone (202) 663-2817; email [DDTCTPublicComments@state.gov](mailto:DDTCTPublicComments@state.gov).

ATTN: Regulatory Change, USML Categories I, II, and III.

**SUPPLEMENTARY INFORMATION:** The Directorate of Defense Trade Controls (DDTC), U.S. Department of State, administers the International Traffic in Arms Regulations (ITAR) (22 CFR parts 120 through 130). The items subject to the jurisdiction of the ITAR, *i.e.*, "defense articles," are identified on the ITAR's U.S. Munitions List (USML) (22 CFR 121.1). With few exceptions, items not subject to the export control jurisdiction of the ITAR are subject to the jurisdiction of the Export Administration Regulations (EAR, 15 CFR parts 730 through 774, which includes the Commerce Control List (CCL) in Supplement No. 1 to part 774), administered by the Bureau of Industry and Security (BIS), U.S. Department of Commerce. Both the ITAR and the EAR impose license requirements on exports and reexports. The Department of Commerce is publishing a companion rule in this edition of the **Federal Register**.

Pursuant to section 38(a)(1) of the Arms Export Control Act (AECA), all defense articles controlled for export or import are part of the United States Munitions List under the AECA. All references to the USML in this rule, however, are to the list of AECA defense articles that are controlled for purposes of export or temporary import pursuant to the ITAR, and not to the list of AECA defense articles on the United States Munitions Import List (USMIL) that are controlled by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) for purposes of permanent import under its regulations at 27 CFR part 447. References to the USMIL are to the list of AECA defense articles controlled by ATF for purposes of permanent import.

Section 38(b)(1)(A)(ii) of the AECA, requires, with limited exceptions, registration of persons who engage in the business of brokering activities with respect to the manufacture, export, import, or transfer of any defense article or defense service designated by the President as such under section 38(a)(1) and licensing for such activities. Through Executive Order 13637, the President delegated the responsibility for registration and licensing of brokering activities to the Department of State with respect to defense articles or defense services controlled either for purposes of export by the Department of State or for purposes of permanent import by ATF. Section 129.1(b) of the ITAR states this requirement. As such, all defense articles described in the USMIL or the USML are subject to the brokering controls administered by the

U.S. Department of State in part 129 of the ITAR. The transfer of defense articles from the ITAR's USML to the EAR's CCL for purposes of export controls does not affect the list of defense articles controlled on the USML under the AECA for purposes of permanent import or brokering controls for any brokering activity, including facilitation in their manufacture, export, permanent import, transfer, reexport, or retransfer. This rule proposes adding a new paragraph (b)(2)(vii) to § 129.2 to update the enumerated list of actions that are not considered brokering. This change is a conforming change and is needed to address the movement of items from the USML to the CCL that will be subject to the brokering controls, to ensure that the U.S. government does not impose a double licensing requirement on the export, reexport or retransfer of such items.

The Department of State is engaged in an effort to revise the U.S. Munitions List so that its scope is limited to those defense articles that provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use. The articles now controlled by USML Categories I, II, and III that would be removed from the USML under this proposed rule do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad.

#### Revision of Category I

This proposed rule revises USML Category I, covering firearms and related articles, to control only defense articles that are inherently military or that are not otherwise widely available for commercial sale. In particular, the revised category will not include non-automatic and semi-automatic firearms to caliber .50 (12.7mm) inclusive, currently controlled under paragraph (a), and all of the parts, components, accessories, and attachments specially designed for those articles. Such items will be subject to the new controls in Export Control Classification Numbers 0A501, 0A502, 0A503, 0A504, 0A505, 0B501, 0B505, 0D501, 0D505, 0E501, and 0E502. Such controls in Category 0 of the CCL will be published in a separate rule by the Department of Commerce.

Paragraph (a) of USML Category I will cover firearms that fire caseless ammunition. Paragraph (b) will continue to cover fully automatic firearms to caliber .50 (12.7mm) inclusive. Paragraph (c) will cover firearms specially designed to integrate fire control, automatic tracking, or automatic firing systems, and all

weapons previously described in paragraph (c) that remain on the USML will be covered by paragraph (a), (b) or (c) of this category or by Category II. Paragraph (d) will cover fully automatic shotguns. Paragraph (e) will continue to cover silencers, mufflers, sound suppressors, and specially designed parts and components; flash suppressors will be subject to the EAR. Paragraph (f) will be reserved, as riflescopes and other firearms sighting devices may be controlled in USML Category XII if they have night vision or infrared capabilities, and other riflescopes will be subject to the EAR. Paragraph (g) will continue to cover barrels, receivers (frames), bolts, bolt carriers, slides, or sears, specially designed for the firearms in Category I. Paragraph (h) will cover high capacity (greater than 50 rounds) magazines, and parts and components to convert a semi-automatic firearm into a fully automatic firearm, and accessories or attachments specially designed to automatically stabilize aim (other than gun rests) or for automatic targeting. Paragraph (i) will continue to cover the technical data and defense services.

A new (x) paragraph will be added to USML Category I, allowing ITAR licensing for commodities, software, and technology subject to the EAR, provided those commodities, software, and technology are to be used in or with defense articles controlled in USML Category I *and* are described in the purchase documentation submitted with the license application.

The note to Category I will be retained, with conforming revisions. A new second note will be added to clarify the terms “firearm,” “fully automatic,” and “caseless ammunition.”

#### Revision of Category II

This proposed rule revises USML Category II, covering guns and armament, establishing a bright line between the USML and the CCL for the control of these articles.

Most significantly, paragraph (j), controlling parts and components, will be revised to enumerate the articles controlled therein.

Paragraph (a) will be revised to enumerate the articles controlled in that paragraph. The articles currently covered in paragraph (c) (apparatus and devices for launching or delivering ordnance) still warranting control on the ITAR will be included in new paragraph (a)(4). A new paragraph (a)(5) will be added for developmental guns and armaments funded by the Department of Defense and the specially designed parts and components of those developmental guns and armaments. The articles currently controlled in paragraph (f),

engines for self-propelled guns and howitzers in paragraph (a), will be on the CCL in ECCN 0A606. Tooling and equipment for the production of articles controlled in USML Category II, currently in paragraph (g), will be on the CCL in ECCN 0B602. Test and evaluation equipment, currently in paragraph (h), will be on the CCL in ECCN 0B602. Certain autoloading systems controlled in paragraph (i) will be moved to paragraphs (j)(9) and (11).

A new (x) paragraph will be added to USML Category II, allowing ITAR licensing for commodities, software, and technology subject to the EAR, provided those commodities, software, and technology are to be used in or with defense articles controlled in USML Category II *and* are described in the purchase documentation submitted with the application.

#### Revision of Category III

This proposed rule revises USML Category III, covering ammunition and ordnance, to establish a bright line between the USML and the CCL for the control of these articles and to be consistent with the changes to Category I.

Most significantly, paragraphs (a) and (d) will be revised to remove broad catch-alls and enumerate the articles to be controlled therein. For example, paragraph (a), which controls ammunition for articles in USML Categories I and II, will be revised to specifically list the ammunition that it controls. A new paragraph (a)(10) will be added for developmental ammunition funded by the Department of Defense and the parts and components specially designed for such developmental ammunition. Ammunition not enumerated in paragraph (a) will be subject to the EAR. Likewise, revised paragraph (d), which controls parts and components, will enumerate the articles it controls; those articles not identified but currently captured via the catch-all will be subject to the EAR.

Additionally, paragraph (c), which controls production equipment and tooling, will be removed and placed into reserve. The articles currently covered by this paragraph will be subject to the EAR.

A new (x) paragraph will be added to USML Category III, allowing ITAR licensing for commodities, software, and technology subject to the EAR, provided those commodities, software, and technology are to be used in or with defense articles controlled in USML Category III *and* are described in the purchase documentation submitted with the application.

#### Conforming ITAR Changes

Additionally, conforming changes will be made to several sections of the ITAR that refer to the current controls in USML Category I(a). These sections will be amended because they all refer to firearms that will be controlled on the CCL. Section 123.16(b)(2) will be revised to remove reference to the firearms exemptions at § 123.17(a) through (e), which describe the firearms exemptions, because the paragraphs will be removed as a consequence of the control of non-automatic and semi-automatic firearms on the CCL. For the same reason, § 123.16(b)(6) will be revised to describe only the remaining exemption at § 123.17 (personal protective gear), and § 123.16(b)(7) will be reserved. Section 123.17 will be amended to remove paragraphs (a) through (e), consistent with changes made to the USML. Section 123.18, as it describes exemptions for firearms that will be controlled for export by the Department of Commerce, will be removed and placed into reserve. Revision of § 124.14(c)(9) will remove the example of “sporting firearms for commercial resale.” The policy guidance on Zimbabwe in § 126.1(s) will be revised to remove reference to the firearms exemption in § 123.17.

Section 129.1(b) of the ITAR will be revised to clarify that the regulations on brokering activities in part 129 apply to those defense articles and defense services designated as such on the USML and those items described on the USMIL (27 CFR 447.21). Section 129.4 of the ITAR will also be revised to clarify brokering requirements for items on the USMIL that are subject to the brokering requirements of the AECA. The items that will move to the CCL for export control purposes, yet are on the USMIL for permanent import purposes, remain subject to the brokering requirements of part 129 with respect to all brokering activities, including facilitation in their manufacture, export, permanent import, transfer, reexport, or retransfer. The revisions also clarify that foreign defense articles that are on the USMIL require brokering authorizations.

#### Request for Comments

The Department welcomes comments from the public and specifically requests input on the following matters:

(1) A key goal of this rulemaking is to ensure the USML and the CCL together control all the items that meet Wassenaar Arrangement commitments embodied in its Munitions List Categories 1, 2 and 3 (WA-ML1, WA-ML2 and WA-ML3). Readers are asked to identify any potential gap in coverage



brought about by the changes for USML Categories I, II and III contained in this notice and the new Category 0, 0x5zz ECCNs published separately by the Department of Commerce when reviewed together.

(2) The Department seeks to establish clear distinctions between the USML and the CCL for the control of firearms, large guns, armaments, ordnance and ammunition. The public should provide any specific examples of firearms (or parts, components, accessories thereof), large guns, armaments, ordnance or ammunition whose jurisdiction is unclear based on this revision.

(3) The Department has, in the past, adopted a delayed effective date of 180 days for rules revising entire categories of the USML and moving items to the CCL. The Department seeks to allow industry sufficient time to implement this rule, including time to make changes to IT systems, technology controls plans, and other business processes. The public should provide input on the time necessary to implement any final rule for these categories, as well as a description of any increased burden that, in the view of the commenter, would be imposed on businesses or individuals should this rule be adopted.

### Regulatory Analysis and Notices

#### *Administrative Procedure Act*

The Department of State is of the opinion that controlling the import and export of defense articles and services is a foreign affairs function of the United States government and that rules implementing this function are exempt from sections 553 (rulemaking) and 554 (adjudications) of the Administrative Procedure Act (APA). Although the Department is of the opinion that this proposed rule is exempt from the rulemaking provisions of the APA and without prejudice to its determination that controlling the import and export of defense services is a foreign affairs function, the Department is publishing this proposed rule with a 45-day provision for public comment.

#### *Regulatory Flexibility Act*

Since the Department is of the opinion that this proposed rule is exempt from the rulemaking provisions of 5 U.S.C. 553, it does not require analysis under the Regulatory Flexibility Act.

#### *Unfunded Mandates Reform Act of 1995*

This proposed amendment does not involve a mandate that will result in the expenditure by State, local, and tribal governments, in the aggregate, or by the

private sector, of \$100 million or more in any year and it will not significantly or uniquely affect small governments. Therefore, no actions were deemed necessary under the provisions of the Unfunded Mandates Reform Act of 1995.

#### *Small Business Regulatory Enforcement Fairness Act of 1996*

This rulemaking has been found not to be a major rule within the meaning of the Small Business Regulatory Enforcement Fairness Act of 1996.

#### *Executive Orders 12372 and 13132*

This rulemaking will not have substantial direct effects on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government. Therefore, in accordance with Executive Order 13132, it is determined that this rulemaking does not have sufficient federalism implications to require consultations or warrant the preparation of a federalism summary impact statement. The regulations implementing Executive Order 12372 regarding intergovernmental consultation on Federal programs and activities do not apply to this rulemaking.

#### *Executive Orders 12866 and 13563*

Executive Orders 12866 and 13563 direct agencies to assess all costs and benefits of available regulatory alternatives and, if regulation is necessary, to select regulatory approaches that maximize net benefits (including potential economic, environmental, public health and safety effects, distributed impacts, and equity). The Department believes that the benefits of this rulemaking largely outweigh any costs, in that many items currently controlled on the more-restrictive USML are being moved to the CCL. We request comment from the public on any impact that would be imposed on the public if this rule were adopted.

Executive Order 13563 emphasizes the importance of considering both benefits and costs, both qualitative and quantitative, of harmonizing rules, and of promoting flexibility. This rule has been designated a "significant regulatory action," although not economically significant, under section 3(f) of Executive Order 12866. Accordingly, the rule has been reviewed by the Office of Management and Budget (OMB).

The Department believes the effect of this proposed rule would decrease the number of license applications

submitted to the Department under OMB Control No. 1405-0003 by approximately 10,000 annually, for which the average burden estimates are one hour per form, which results in a burden reduction of 10,000 hours per year.

The Department of Commerce estimates that 4,000 of the 10,000 licenses that were required by the Department will be eligible for license exceptions or otherwise not require a separate license under the EAR. The Department of Commerce estimates that 6,000 transactions will require an individual validated license. The Department of Commerce will be collecting the information necessary to process license applications under OMB Control No. 0694-0088. The Department of Commerce estimates that OMB Control No. 0694-0088 takes approximately 43.8 minutes for a manual or electronic submission. The Department of Commerce estimates that the 6,000 licenses constitute a burden of 4,380 hours for this collection. The Department estimates a reduction in burden of 10,000 hours due to the proposed transition of these items to the Department of Commerce. The Department of Commerce estimates that the burden of submitting license applications for these items to the Department of Commerce will be 4,380 burden hours. Therefore, the net burden would be reduced by 5,620 hours. The Department estimates that the burden hour cost for completing a license application is \$44.94 per hour. Therefore, the estimated net reduction of 5,620 burden hours per year is estimated to result in annual burden hour cost reduction of \$252,562.80. There may also be other State Department forms that will no longer need to be submitted and that may further reduce the burden hours for applicants. The Department is seeking comments on the reduction from the other forms, as referenced below.

In addition to the reduction in burden hours, there will be direct cost savings to the State Department that would result from the 10,000 license applications no longer being required under the ITAR once these items are moved to the EAR. Pursuant to the AECA, ITAR, and associated delegations of authority, every person who engages in the business of brokering activities, manufacturing, exporting, or temporarily importing any defense articles or defense services must register with the Department of State and pay a registration fee. The Department of State adopted the current fee schedule to align the registration fees with the cost of licensing, compliance and other

related activities. The Department of Commerce would incur additional costs to administer these controls and process license applications. However, the Department of Commerce does not charge a registration fee to exporters under the EAR and we are unable to estimate the increase in costs to the Department of Commerce to process the new license applications. Therefore, we are unable to provide an estimate of the net change in resource costs to the government from moving these items from the ITAR to the EAR. It is the case, however, that the movement of these items from the ITAR would result in a direct transfer of \$2,500,000 per year from the government to the exporting public, less the increased cost to taxpayers, because they would no longer pay fees to the State Department and there is no fee charged by the Department of Commerce to apply for a license.

The Department welcomes comments from the public on the net reduction in burden described within this section, particularly if there are additional burden reductions that are not reflected here (please provide number of hours or cost) or if the estimates noted here appear otherwise inaccurate.

#### Estimated Cost Savings

The Department of State is of the opinion that controlling the import and export of defense articles and services is a foreign affairs function of the United States government and that rules implementing this function are exempt from Executive Order 13771 (82 FR 9339, February 3, 2017). Although the Department is of the opinion that this proposed rule is exempt from E.O. 13771 and without prejudice to its determination that controlling the import and export of defense services is a foreign affairs function, this proposed rule is expected to be an E.O. 13771 deregulatory action. The Department has conducted this analysis in close consultation with the Department of Commerce. The total annual recurring dollar cost savings is estimated to be \$1,376,281 for purposes of E.O. 13771 for the Department of State.

#### Executive Order 12988

The Department of State has reviewed this rulemaking in light of sections 3(a) and 3(b)(2) of Executive Order 12988 to eliminate ambiguity, minimize litigation, establish clear legal standards, and reduce burden.

#### Executive Order 13175

The Department of State has determined that this rulemaking will not have tribal implications, will not

impose substantial direct compliance costs on Indian tribal governments, and will not preempt tribal law. Accordingly, Executive Order 13175 does not apply to this rulemaking.

#### Paperwork Reduction Act

Notwithstanding any other provision of law, no person is required to respond to, nor is subject to a penalty for failure to comply with, a collection of information, subject to the requirements of the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*) (PRA), unless that collection of information displays a currently valid OMB control number.

The Department of State believes there would be a reduction in burden for OMB Control No. 1405–0003, Application/License for Permanent Export of Unclassified Defense Articles and Related Unclassified Technical Data. This form is an application that, when completed and approved by Department of State, constitutes the official record and authorization for the commercial export of unclassified U.S. Munitions List articles and technical data, pursuant to the AECA and ITAR. For an analysis of the reduction in burden for OMB Control No. 1405–0003, see the above Section for E.O. 12866. The Department of State requests comments on the collection of information or potential reduction in burden be sent also to the Office of Information and Regulatory Affairs of OMB, Attention: Desk Officer for Department of State, at [OIRA\\_Submission@omb.eop.gov](mailto:OIRA_Submission@omb.eop.gov) or Attention: Desk Officer for Department of State, Office of Information and Regulatory Affairs of OMB, 725 17th St. NW, Washington, DC 20503.

#### List of Subjects in 22 CFR Parts 121, 123, 124, 126, and 129

Arms and munitions, Exports.

Accordingly, for the reasons set forth above, title 22, chapter I, subchapter M, parts 121, 123, 124, 126, and 129 are proposed to be amended as follows:

#### PART 121—THE UNITED STATES MUNITIONS LIST

■ 1. The authority citation for part 121 continues to read as follows:

**Authority:** Secs. 2, 38, and 71, Pub. L. 90–629, 90 Stat. 744 (22 U.S.C. 2752, 2778, 2797); 22 U.S.C. 2651a; Pub. L. 105–261, 112 Stat. 1920; Section 1261, Pub. L. 112–239; E.O. 13637, 78 FR 16129.

■ 2. Section 121.1 is amended by revising U.S. Munitions List Categories I, II, and III to read as follows:

#### § 121.1 The United States Munitions List.

\* \* \* \* \*

#### Category I—Firearms and Related Articles

\*(a) Firearms using caseless ammunition.

\*(b) Fully automatic firearms to .50 caliber (12.7 mm) inclusive.

\*(c) Firearms specially designed to integrate fire control, automatic tracking, or automatic firing (*e.g.*, Precision Guided Firearms (PGFs)), and specially designed parts and components therefor.

**Note to paragraph (c):** Integration does not include only attaching to the firearm or rail.

\*(d) Fully automatic shotguns regardless of gauge.

\*(e) Silencers, mufflers, and sound suppressors, and specially designed parts and components therefor.

(f) [Reserved]

(g) Barrels, receivers (frames), bolts, bolt carriers, slides, or sears specially designed for the articles in paragraphs (a), (b), and (d) of this category.

(h) Parts, components, accessories, and attachments, as follows:

(1) Drum and other magazines for firearms to .50 caliber (12.7 mm) inclusive with a capacity greater than 50 rounds, regardless of jurisdiction of the firearm, and specially designed parts and components therefor;

(2) Parts and components specially designed for conversion of a semi-automatic firearm to a fully automatic firearm.

(3) Accessories or attachments specially designed to automatically stabilize aim (other than gun rests) or for automatic targeting, and specially designed parts and components therefor.

(i) Technical data (*see* § 120.10 of this subchapter) and defense services (*see* § 120.9 of this subchapter) directly related to the defense articles described in paragraphs (a), (b), (d), (e), (g), and (h) of this category and classified technical data directly related to items controlled in ECCNs 0A501, 0B501, 0D501, and 0E501 and defense services using the classified technical data. (*See* § 125.4 of this subchapter for exemptions.)

(j)–(w) [Reserved]

(x) Commodities, software, and technology subject to the EAR (*see* § 120.42 of this subchapter) used in or with defense articles.

**Note to paragraph (x):** Use of this paragraph is limited to license applications for defense articles where the purchase documentation includes commodities, software, or technology subject to the EAR (*see* § 123.1(b) of this subchapter).

**Note 1 to Category I:** Paragraphs (a), (b), (d), (e), (g), (h), and (i) of this category exclude: Any non-automatic or semi-

automatic firearms to .50 caliber (12.7 mm) inclusive; non-automatic shotguns; BB, pellet, and muzzle loading (e.g., black powder) firearms; and parts, components, accessories, and attachments of firearms and shotguns in paragraphs (a), (b), (d), and (g) of this category that are common to non-automatic firearms and shotguns. The Department of Commerce regulates the export of such items. See the Export Administration Regulations (15 CFR parts 730 through 774).

**Note 2 to Category I:** The following interpretations explain and amplify the terms used in this category:

(1) A firearm is a weapon not over .50 caliber (12.7 mm) which is designed to expel a projectile by the deflagration of propellant.

(2) A fully automatic firearm or shotgun is any firearm or shotgun which shoots, is designed to shoot, or can readily be restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.

(3) Caseless ammunition is firearm ammunition without a cartridge case that holds the primer, propellant, and projectile together as a unit.

#### Category II—Guns and Armament

(a) Guns and armament greater than .50 caliber (12.7 mm), as follows:

\* (1) Guns, howitzers, artillery, and cannons;

\* (2) Mortars;

\* (3) Recoilless rifles;

\* (4) Grenade launchers; or

(5) Developmental guns and armament greater than .50 caliber (12.7 mm) funded by the Department of Defense and specially designed parts and components therefor.

**Note 1 to paragraph (a)(5):** This paragraph does not control guns and armament greater than .50 caliber (12.7 mm) (a) in production, (b) determined to be subject to the EAR via a commodity jurisdiction determination (see § 120.4 of this subchapter), or (c) identified in the relevant Department of Defense contract or other funding authorization as being developed for both civil and military applications.

**Note 2 to paragraph (a)(5):** Note 1 does not apply to defense articles enumerated on the U.S. Munitions List, whether in production or development.

**Note 3 to paragraph (a)(5):** This provision is applicable to those contracts or other funding authorizations that are dated (one year after publication of the final rule), or later.

**Note 1 to paragraph (a):** This paragraph does not include: Non-automatic and non-semi-automatic rifles, carbines, and pistols between .50 (12.7 mm) and .72 caliber (18.288 mm) that are controlled on the CCL under ECCN 0A501; shotguns controlled on the CCL under ECCN 0A502; or black powder guns and armaments manufactured between 1890 and 1919 controlled on the CCL under ECCN 0A602.

**Note 2 to paragraph (a):** Guns and armament when integrated into their carrier (e.g., ships, ground vehicles, or aircraft) are controlled in the category associated with the carrier. Self-propelled guns and armament are controlled in USML Category VII. Towed guns and armament and stand-alone guns and armament are controlled under this category.

(b) Flame throwers with a minimum effective range of 20 meters.

(c) [Reserved]

\* (d) Kinetic energy weapon systems specially designed for destruction or rendering mission-abort of a target.

**Note to paragraph (d):** Kinetic energy weapons systems include but are not limited to launch systems and subsystems capable of accelerating masses larger than 0.1g to velocities in excess of 1.6 km/s, in single or rapid fire modes, using methods such as: Electromagnetic, electrothermal, plasma, light gas, or chemical. This does not include launch systems and subsystems used for research and testing facilities subject to the EAR, which are controlled on the CCL under ECCN 2B232.

(e) Signature reduction devices specially designed for the guns and armament controlled in paragraphs (a), (b), and (d) of this category (e.g., muzzle flash suppression devices).

(f)–(i) [Reserved]

(j) Parts, components, accessories, and attachments, as follows:

(1) Gun barrels, rails, tubes, and receivers specially designed for the weapons controlled in paragraphs (a) and (d) of this category;

(2) Sights specially designed to orient indirect fire weapons;

(3) Breech blocks for the weapons controlled in paragraphs (a) and (d) of this category;

(4) Firing mechanisms for the weapons controlled in paragraphs (a) and (d) of this category and specially designed parts and components therefor;

(5) Systems for firing superposed or stacked ammunition and specially designed parts and components therefor;

(6) Servo-electronic and hydraulic elevation adjustment mechanisms;

(7) Muzzle brakes;

(8) Bore evacuators;

(9) Independently powered ammunition handling systems and platform interface components as follows:

(i) Mounts;

(ii) Carriages;

(iii) Gun pallets;

(iv) Hydro-pneumatic equilibration cylinders; or

(v) Hydro-pneumatic systems capable of scavenging recoil energy to power howitzer functions;

**Note to paragraph (j)(9):** For weapons mounts specially designed for ground vehicles, see Category VII.

(10) Recoil systems to mitigate the shock associated with the firing process of guns integrated into air platforms and specially designed parts and components therefor;

(11) Independent ammunition handling systems for the guns and armament controlled in paragraphs (a), (b), and (d) of this category;

(12) Ammunition containers/drums, ammunition chutes, ammunition conveyor elements, and ammunition container/drum entrance and exit units, specially designed for the guns and armament controlled in paragraphs (a), (b), and (d) of this category;

(13) Aircraft/gun interface units to support gun systems with a designed rate of fire greater than 100 rounds per minute and specially designed parts and components therefor;

(14) Prime power generation, energy storage, thermal management, conditioning, switching, and fuel-handling equipment, and the electrical interfaces between the gun power supply and other turret electric drive components specially designed for kinetic weapons controlled in paragraph (d) of this category;

(15) Kinetic energy weapon target acquisition, tracking fire control, and damage assessment systems and specially designed parts and components therefor; or

\* (16) Any part, component, accessory, attachment, equipment, or system that:

(i) Is classified;

(ii) Contains classified software; or

(iii) Is being developed using classified information.

“Classified” means classified pursuant to Executive Order 13526, or predecessor order, and a security classification guide developed pursuant thereto or equivalent, or to the corresponding classification rules of another government or intergovernmental organization.

(k) Technical data (see § 120.10 of this subchapter) and defense services (see § 120.9 of this subchapter) directly related to the defense articles described in paragraphs (a), (b), (d), (e), and (j) of this category and classified technical data directly related to items controlled in ECCNs 0A602, 0B602, 0D602, and 0E602 and defense services using the classified technical data. (See § 125.4 of this subchapter for exemptions.)

(l)–(w) [Reserved]

(x) Commodities, software, and technology subject to the EAR (see § 120.42 of this subchapter) used in or with defense articles.



**Note to paragraph (x):** Use of this paragraph is limited to license applications for defense articles where the purchase documentation includes commodities, software, or technology subject to the EAR (see § 123.1(b) of this subchapter).

### Category III—Ammunition and Ordnance

\*(a) Ammunition, as follows:

(1) Ammunition that incorporates a projectile controlled in paragraph (d)(1) or (3) of this category;

(2) Ammunition preassembled into links or belts;

(3) Shotgun ammunition that incorporates a projectile controlled in paragraph (d)(2) of this category;

(4) Caseless ammunition manufactured with smokeless powder;

**Note to paragraph (a)(4):** Caseless ammunition is ammunition without a cartridge case that holds the primer, propellant, and projectile together as a unit.

(5) Ammunition, except shotgun ammunition, based on non-metallic cases, or non-metallic cases that have only a metallic base, which result in a total cartridge mass 80% or less than the mass of a brass- or steel-cased cartridge that provides comparable ballistic performance;

(6) Ammunition employing pyrotechnic material in the projectile base and any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems;

(7) Ammunition for fully automatic firearms or guns that fire superposed or stacked projectiles;

(8) Electromagnetic armament projectiles or billets for weapons with a design muzzle energy exceeding 5 MJ;

(9) Ammunition, not specified above, for the guns and armaments controlled in Category II; or

(10) Developmental ammunition funded by the Department of Defense and specially designed parts and components therefor.

**Note 1 to paragraph (a)(10):** This paragraph does not control ammunition (a) in production, (b) determined to be subject to the EAR via a commodity jurisdiction determination (see § 120.4 of this subchapter), or (c) identified in the relevant Department of Defense contract or other funding authorization as being developed for both civil and military applications.

**Note 2 to paragraph (a)(10):** Note 1 does not apply to defense articles enumerated on the U.S. Munitions List, whether in production or development.

**Note 3 to paragraph (a)(10):** This provision is applicable to those contracts or other

funding authorizations that are dated (one year after publication of the final rule), or later.

(b) Ammunition/ordnance handling equipment specially designed for the articles controlled in this category, as follows:

(1) Belting, linking, and de-linking equipment; or

(2) Fuze setting devices.

(c) [Reserved]

(d) Parts and components for the articles in this category, as follows:

(1) Projectiles that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm or are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one or a combination of the following: tungsten, steel, or beryllium copper alloys;

(2) Shotgun projectiles that are flechettes, incendiary, tracer, or explosive;

**Note to paragraph (d)(2):** This paragraph does not include explosive projectiles specially designed to produce noise for scaring birds or other pests (e.g., bird bombs, whistlers, crackers).

(3) Projectiles of any caliber produced from depleted uranium;

(4) Projectiles not specified above, guided or unguided, for the items controlled in USML Category II, and specially designed parts and components therefor (e.g., fuzes, rotating bands, cases, liners, fins, boosters);

(5) Canisters or sub-munitions (e.g., bomblets or minelets), and specially designed parts and components therefor, for the guns or armament controlled in USML Category II;

(6) Hardened cores, regardless of caliber, produced from one or a combination of the following: tungsten, steel, or beryllium copper alloy;

(7) Cartridge cases, powder bags, or combustible cases for the items controlled in USML Category II;

(8) Non-metallic cases, including cases that have only a metallic base, for the ammunition controlled in paragraph (a)(5) of this category;

(9) Cartridge links and belts for fully automatic firearms and guns controlled in USML Categories I or II;

(10) Primers other than Boxer, Berdan, or shotshell types;

**Note to paragraph (d)(10):** This paragraph does not control caps or primers of any type in use prior to 1890.

(11) Safing, arming, and fuzing components (to include target detection and proximity sensing devices) for the ammunition in this category and specially designed parts therefor;

(12) Guidance and control components for the ammunition in this

category and specially designed parts therefor;

(13) Terminal seeker assemblies for the ammunition in this category and specially designed parts and components therefor;

(14) Illuminating flares or target practice projectiles for the ammunition controlled in paragraph (a)(9) of this category; or

\*(15) Any part, component, accessory, attachment, equipment, or system that:

(i) Is classified;

(ii) Contains classified software; or

(iii) Is being developed using classified information.

“Classified” means classified pursuant to Executive Order 13526, or predecessor order, and a security classification guide developed pursuant thereto or equivalent, or to the corresponding classification rules of another government or intergovernmental organization.

(e) Technical data (see § 120.10 of this subchapter) and defense services (see § 120.9 of this subchapter) directly related to the defense articles enumerated in paragraphs (a), (b), and (d) of this category and classified technical data directly related to items controlled in ECCNs 0A505, 0B505, 0D505, and 0E505 and defense services using the classified technical data. (See § 125.4 of this subchapter for exemptions.)

(f)–(w) [Reserved]

(x) Commodities, software, and technology subject to the EAR (see § 120.42 of this subchapter) used in or with defense articles.

**Note to paragraph (x):** Use of this paragraph is limited to license applications for defense articles where the purchase documentation includes commodities, software, or technology subject to the EAR (see § 123.1(b) of this subchapter).

**Notes to Category III:** 1. This category does not control ammunition crimped without a projectile (blank star) and dummy ammunition with a pierced powder chamber.

2. This category does not control cartridge and shell casings that, prior to export, have been rendered useless beyond the possibility of restoration for use as a cartridge or shell casing by means of heating, flame treatment, mangling, crushing, cutting, or popping.

3. Grenades containing non-lethal or less lethal projectiles are under the jurisdiction of the Department of Commerce.

\* \* \* \* \*

### PART 123—LICENSES FOR THE EXPORT OF DEFENSE ARTICLES

■ 3. The authority citation for part 123 continues to read as follows:

**Authority:** Secs. 2, 38, and 71, Pub. L. 90–629, 90 Stat. 744 (22 U.S.C. 2752, 2778,

2797); 22 U.S.C. 2753; 22 U.S.C. 2651a; 22 U.S.C. 2776; Pub. L. 105–261, 112 Stat. 1920; Sec. 1205(a), Pub. L. 107–228; Sec. 520, Pub. L. 112–55; Section 1261, Pub. L. 112–239; E.O. 13637, 78 FR 16129.

■ 4. Section 123.15 is amended by revising paragraph (a)(3) to read as follows:

**§ 123.15 Congressional certification pursuant to Section 36(c) of the Arms Export Control Act.**

(a) \* \* \*

(3) A license for export of defense articles controlled under Category I paragraphs (a) through (g) of the United States Munitions List, § 121.1 of this subchapter, in an amount of \$1,000,000 or more.

\* \* \* \* \*

■ 5. Section 123.16 is amended by revising paragraphs (b)(2) introductory text and (b)(6) and removing and reserving paragraph (b)(7) to read as follows:

**§ 123.16 Exemptions of general applicability.**

\* \* \* \* \*

(b) \* \* \*

(2) Port Directors of U.S. Customs and Border Protection shall permit the export of parts or components without a license when the total value does not exceed \$500 in a single transaction and:

\* \* \* \* \*

(6) For exemptions for personal protective gear, refer to § 123.17.

\* \* \* \* \*

■ 6. Section 123.17 is amended by revising the section heading, removing and reserving paragraphs (a) through (e), and revising paragraph (j) to read as follows:

**§ 123.17 Exemption for personal protective gear.**

\* \* \* \* \*

(j) If the articles temporarily exported pursuant to paragraphs (f) through (i) of this section are not returned to the United States, a detailed report must be submitted to the Office of Defense Trade Controls Compliance in accordance with the requirements of § 127.12(c)(2) of this subchapter.

\* \* \* \* \*

**§ 123.18 [Removed and Reserved]**

■ 7. Section 123.18 is removed and reserved.

**PART 124—AGREEMENTS, OFF-SHORE PROCUREMENT, AND OTHER DEFENSE SERVICES**

■ 8. The authority citation for part 124 continues to read as follows:

**Authority:** Secs. 2, 38, and 71, Pub. L. 90–629, 90 Stat. 744 (22 U.S.C. 2752, 2778, 2797); 22 U.S.C. 2651a; 22 U.S.C. 2776; Section 1514, Pub. L. 105–261; Pub. L. 111–266; Section 1261, Pub. L. 112–239; E.O. 13637, 78 FR 16129.

■ 9. Section 124.14 is amended by revising paragraph (c)(9) to read as follows:

**§ 124.14 Exports to warehouses or distribution points outside the United States.**

\* \* \* \* \*

(c) \* \* \*

(9) Unless the articles covered by the agreement are in fact intended to be distributed to private persons or entities (e.g., cryptographic devices and software for financial and business applications), the following clause must be included in all warehousing and distribution agreements: “Sales or other transfers of the licensed article shall be limited to governments of the countries in the distribution territory and to private entities seeking to procure the licensed article pursuant to a contract with a government within the distribution territory, unless the prior written approval of the U.S. Department of State is obtained.”

\* \* \* \* \*

**PART 126—GENERAL POLICIES AND PROVISIONS**

■ 10. The authority citation for part 126 continues to read as follows:

**Authority:** Secs. 2, 38, 40, 42 and 71, Pub. L. 90–629, 90 Stat. 744 (22 U.S.C. 2752, 2778, 2780, 2791 and 2797); 22 U.S.C. 2651a; 22 U.S.C. 287c; E.O. 12918, 59 FR 28205; 3 CFR, 1994 Comp., p. 899; Sec. 1225, Pub. L. 108–375; Sec. 7089, Pub. L. 111–117; Pub. L. 111–266; Section 7045, Pub. L. 112–74; Section 7046, Pub. L. 112–74; E.O. 13637, 78 FR 16129.

■ 11. Section 126.1 is amended by revising paragraph(s) to read as follows:

**§ 126.1 Prohibited exports, imports, and sales to or from certain countries.**

\* \* \* \* \*

(s) *Zimbabwe*. It is the policy of the United States to deny licenses or other approvals for exports or imports of defense articles and defense services destined for or originating in Zimbabwe,

except that a license or other approval may be issued, on a case-by-case basis, for the temporary export of firearms and ammunition for personal use by individuals (not for resale or retransfer, including to the Government of Zimbabwe).

\* \* \* \* \*

**PART 129—REGISTRATION AND LICENSING OF BROKERS**

■ 12. The authority citation for part 129 continues to read as follows:

**Authority:** Section 38, Pub. L. 104–164, 110 Stat. 1437, (22 U.S.C. 2778); E.O. 13637, 78 FR 16129.

■ 13. Section 129.1 is amended by revising paragraph (b) to read as follows:

**§ 129.1 Purpose.**

\* \* \* \* \*

(b) All brokering activities identified in this subchapter apply equally to those defense articles and defense services designated in § 121.1 of this subchapter and those items designated in 27 CFR 447.21 (U.S. Munitions Import List).

■ 14. Section 129.2 is amended by:

■ a. In paragraph (b)(2)(v), removing the word “or” at the end of the paragraph;

■ b. Removing the period at the end of paragraph (b)(2)(vi) and adding “; or” in its place; and

■ c. Adding paragraph (b)(2)(vii).

The addition reads as follows:

**§ 129.2 Definitions.**

\* \* \* \* \*

(b) \* \* \*

(2) \* \* \*

(vii) Activities by persons to facilitate the export, reexport, or transfer of an item subject to the EAR that has been approved pursuant to a license or license exception under the EAR or a license or other approval under this subchapter.

\* \* \* \* \*

■ 15. Section 129.4 is amended by revising paragraphs (a)(1) and (a)(2)(i) to read as follows:

**§ 129.4 Requirement for approval.**

(a) \* \* \*

(1) Any foreign defense article or defense service enumerated in part 121 of this subchapter (see § 120.44 of this subchapter, and § 129.5 for exemptions) and those foreign origin items on the U.S. Munitions Import List (see 27 CFR 447.21); or



(2) \* \* \*

(i) Firearms and other weapons of a nature described by Category I(a) through (d), Category II(a) and (d), and Category III(a) of § 121.1 of this subchapter or Category I(a) through (c), Category II(a), and Category III(a) of the

U.S. Munitions Import List (*see* 27 CFR 447.21);

\* \* \* \* \*

■ 16. Section 129.6 is amended by revising paragraph (b)(3)(i) to read as follows:

**§ 129.6 Procedures for obtaining approval.**

\* \* \* \* \*

(b) \* \* \*

(3) \* \* \*

(i) The U.S. Munitions List (*see* § 121.1 of this subchapter) or U.S. Munitions Import List (*see* 27 CFR 447.21) category and sub-category for each article;

\* \* \* \* \*

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